

IN THE
SUPREME COURT OF THE UNITED STATES

October Term 1986

No: 86-1472

VIVIENNE RABIDUE,

Petitioner

v

OSCEOLA REFINING COMPANY
A division of Texas-American
Petrochemicals, Inc.,

Respondent

PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

PETITION OF MICHIGAN TRIAL LAWYERS
ASSOCIATION
TO FILE AS AMICUS CURIAE

OF RECORD:

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Counsel
Amicus Curiae
Michigan Trial
Lawyers Association



TABLE OF CONTENTS

Questions Presented.2
Opinions Below3
Jurisdiction4
Statutes and Regulations4
Statement of the Case.8
Argument8
Conclusion	26
Certificate of Service	27
Appendix A (Blue Collar Blues)	

TABLE OF AUTHORITIES

<u>Firefighters Institute for Racial Equality v St. Louis,</u> 549 F.2d 506; 14 FEP Cases 1486 (8th Cir. 1977)	21
<u>Henson v Dundee,</u> 682 F. 2d 897, 29 FEP Cases 787, 791 (11th Cir. 1982)	15
<u>McKinney v Dole,</u> 765 F.2d 1129, 38 FEP Cases 364 (D.C. Cir. 1985)	9,10,12
<u>Meritor Savings Bank v Vinson,</u> ____ U.S. ____; 40 FEP Cases 1822 (1986)	19
<u>Rogers v EEOC,</u> 454 F.2d 234; 4 FEP Cases 92 (5th Cir. 1971).	20
<u>Statutes and Regulations</u>	
Title VII of the Civil Rights Act of 1964, 42 U.S.C. Sect. 2000e-2(a).	4,23
Elliott-Larsen Civil Rights Act, M.C.L.A. 37.2102, <u>et seq.</u>	5,23
EEOC Guidelines on Sexual Harassment; 29 CFR Sec. 16404.11(a)(3), <u>et seq.</u>	6

Articles or Treatises

Gruber & Bjorn, Blue-Collar Blues:
The Sexual Harassment of Women
Autoworkers 16,18(fn.1)

Schreiber, Changing Places. Men
and Women in Transitional
Occupations (M.I.T. Press, 1979). .17



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PETITION OF MICHIGAN TRIAL LAWYERS
ASSOCIATION
FOR PERMISSION TO FILE AS AMICUS CURIAE

The Petitioner, MICHIGAN TRIAL LAWYERS ASSOCIATION, as amicus curiae, respectfully prays that a writ of certiorari issue to review the judgment and opinion of the United States Court of Appeals for the Sixth Circuit entered in this proceeding on November 13, 1986, and prays that Petitioner be permitted to file as amicus curiae.

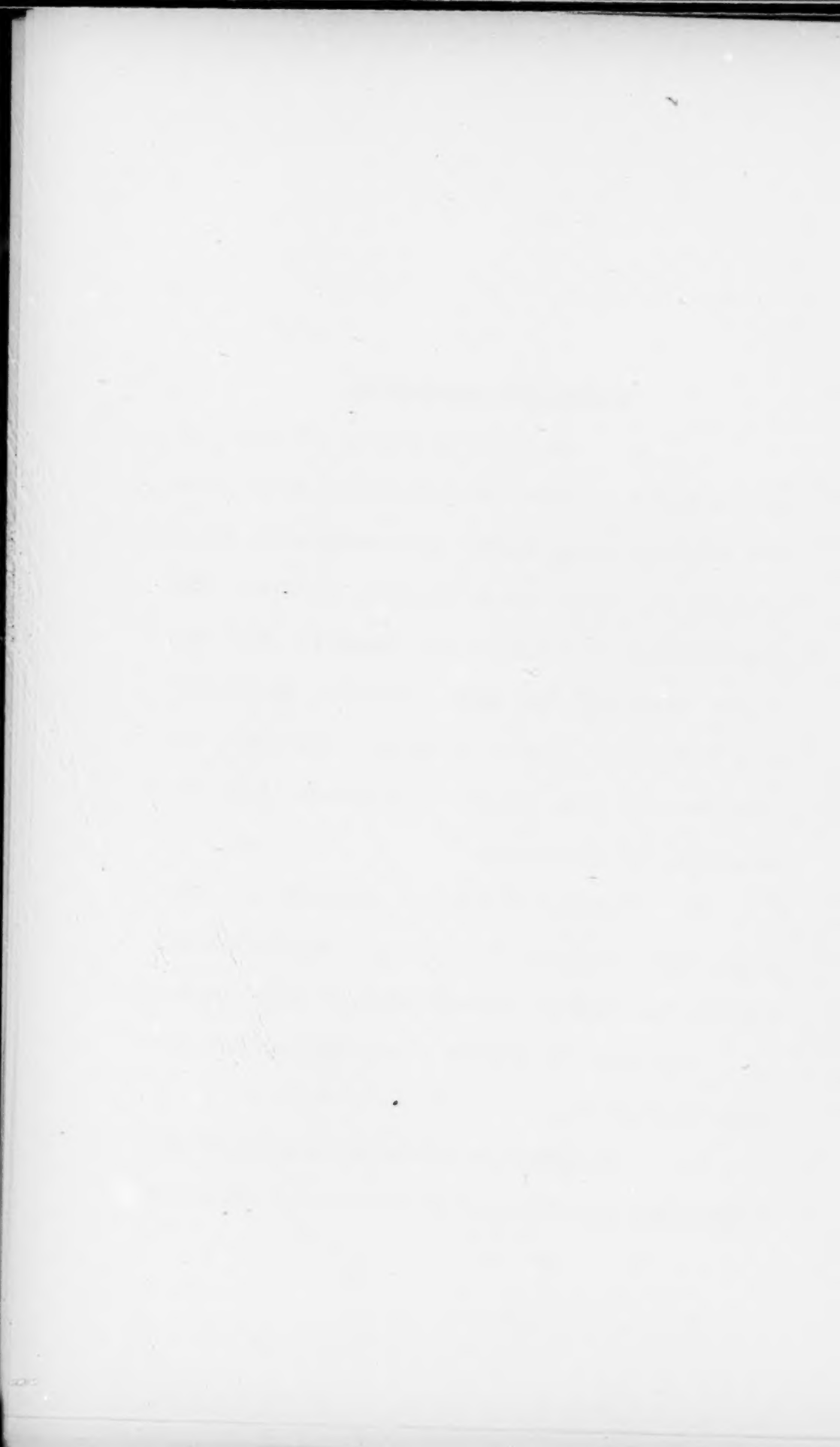


QUESTIONS PRESENTED

1. Whether a claim of hostile environment sexual harassment requires the complaining party to establish that activities were of a sexual nature, as required by the Court of Appeals for the Sixth Circuit, or may include hostile, but not explicitly sexual activity, as required by the Court of Appeals for the District of Columbia.

2. Whether those guilty of the greatest degree of sexual harassment should be deemed less culpable than those in environments where discrimination is less pervasive.

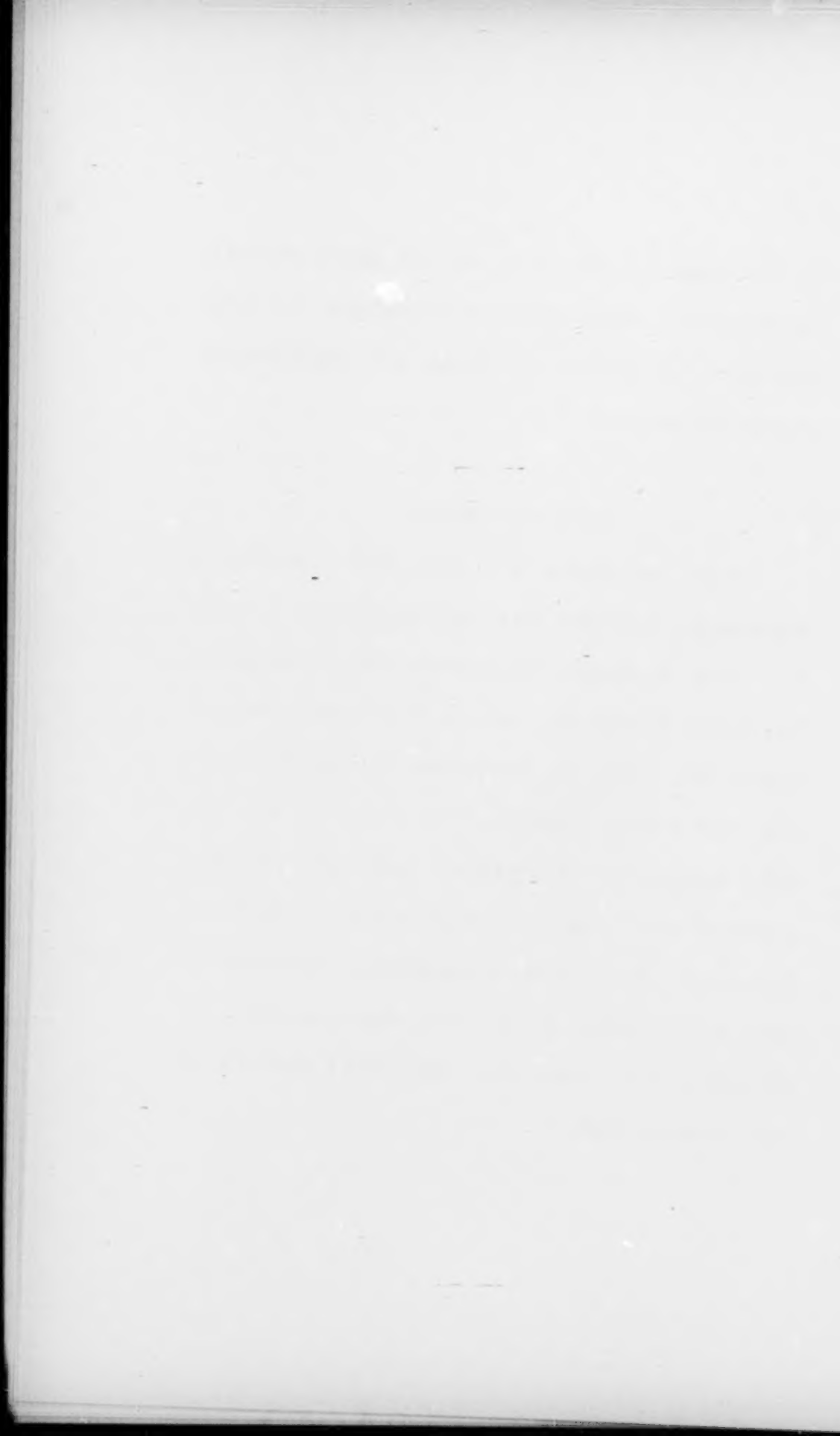
3. Whether a special standard of requiring actual notice should be imposed



on victims of hostile environment sexual harassment, when such a standard is not imposed on other victims of employment discrimination.

OPINIONS BELOW

The opinion of the Hon. Stewart Newblatt, United States District Court for the Eastern District of Michigan, Southern Division, which was entered on April 18, 1984 is reported at 584 F.Supp. 419 (ED Mich, 1984). The opinion of the Hon. Robert P. Krupansky and Hon. H. Ted Milburn for the Sixth Circuit Court of Appeals, with the dissenting opinion of the Hon. Damon J. Keith, was entered on November 13, 1986 (No: 84-1362) and is as yet unreported.



JURISDICTION

The judgment of the Court of Appeals for the Sixth Circuit was entered November 13, 1986, and a timely petition for certiorari was filed within 90 days of that date in accordance with 28 U.S.C. Sec. 2101(c). This Court's jurisdiction is invoked pursuant to 28 U.S.C. Sec.1254(1).

STATUTES AND REGULATIONS INVOLVED

Title VII of the Civil Rights Act of 1964, Pub.L. 88-352, 42 U.S.C. Sec.2000e-2(a) provides in relevant part:

"(a) It shall be an unlawful employment practice for an employer



(1) to fail to refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin." 42 U.S.C. Sec. 2000e-2.

The Elliott-Larsen Civil Rights Act of the State of Michigan, P.A. 1976, No. 453 as amended, M.C.L.A. 37.2102, and

M.C.L.A. 37.2103(h)(i-iii), provides in relevant part as follows:

"(h) Discrimination because of sex includes sexual harassment which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct or communication of a sexual nature when:



(iii) Such conduct or communication has the purpose or effect of substantially interfering with an individual's employment, public accommodations or public services, education, or housing, or creating an intimidating, hostile, or offensive employment, public accommodations, public services, educational, or housing environment."

The EEOC Guidelines on Sexual Harassment, 29 CFR Sec.1604.11(a)(3) provide in relevant part:

"Harassment on the basis of sex is a violation of section 703 of Title VII. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when



(1) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment."

The EEOC Guidelines on Sexual Harassment, 29 CFR Sec.1604.11(d) provide in relevant part:

"With respect to conduct between fellow employees, an employer is responsible for acts of sexual harassment in the workplace where the employer (or its agents or supervisory employees) knows or should have known of the conduct, unless it can show that it took immediate and appropriate action."

STATEMENT OF THE CASE

Amicus curiae Michigan Trial Lawyers Association adopts the Statement of the Case of Petitioner.

ARGUMENT

The decision of the Sixth Circuit of Appeals merits review and reversal by this Court. This holding creates a conflict between the Circuits, establishes a test for victims of hostile environment sex discrimination which is not imposed in instances of any other type of discrimination, and further has the perverse effect of excusing the most egregious offenders from liability.

The Sixth Circuit's insistence that the hostile work environment consist of "unwelcome sexual harassment in the form



of sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature," Petitioner's App., pp.12-13, creates a conflict between Circuits. In McKinney v Dole, 765 F.2d 1129; 38 FEP Cases 364 (D.C. Cir. 1985), the Court of Appeals for the District of Columbia Circuit held that "a physically aggressive but not explicitly sexual act by a male supervisor against a female employee may constitute part of a prohibited pattern of sexual discrimination." McKinney, supra, 38 FEP Cases at 365.

Both McKinney and Rabidue construed the same EEOC guideline, 29 CFR Sec. 1604.11(a)(3) which requires the offensive activity to be of a sexual nature. The DC Circuit, however, acknowledged that even though a Court owes deference to the EEOC interpretation



of the statute, "we do not believe that an EEOC regulation that identifies certain activities as prohibited by Title VII can or should be taken to mean that any other activities are allowed." Id. at n.20.

The Court explained:

"We have never held that sexual harassment or other unequal treatment of an employee or group of employees that occurs because of the sex of the employee must, to be illegal under Title VII, take the form of sexual advances or of other incidents with clearly sexual overtones. And we decline to do so now. Rather, we hold that any harassment or other unequal treatment of an employee or group of employees that would not occur but for the sex of the employee or employees may, if sufficiently patterned or pervasive, comprise

an illegal condition of employment under Title VII.

This conclusion is buttressed by decisions in other circuits regarding the "conditions of employment" provision of the statute. Several courts have held that differential treatment of employees on account of their sex, even if the treatment is not obviously related to the characteristic of sex, violates the "conditions of employment" provision of Title VII. For example, forcing female employees to wear uniforms while allowing male employees to wear their own suits was held by the Seventh Circuit to violate Title VII. See *Carroll v. Talman Federal S & L Ass'n*, 604 F.2d 1028, 1032-1033 & n.13, 20 FEP Cases U.S. 929, 22 FEP cases 315 (1980). See also *Harrington v. Vandalia-Butler Board of Educ.* 585 F.2d



192, 194 n.3, 18 FEP Cases 348 (6th Cir. 1978), cert. denied, 441 U.S. 932, 19 FEP Cases 888 (1979) (inferior locker room facilities for female gym teachers is illegal condition of employment). Cf. Firefighters Institute for Racial Equality v. City of Cases 1486 (8th Cir.), cert. denied, 434 U.S. 819, 15 FEP Cases 1184 (1977) (employers create prohibited discriminatory condition of employment)." Id. at 371, note omitted.

To hold otherwise is to accept the myth, now rejected, which once handicapped rape prosecutions. It is now recognized that sexual assault does not necessarily emanate from desire, but is rather an act of violence which uses sex as the weapon, much as another perpetrator would use a knife or a gun. In much the same way, sexual harassment,



even that which does not have a sexual connotation, is but another manifestation of anti-woman animus in the context of the work environment. Once that is understood, it is obvious that acts and language without a directly sexual content may have the same motivation and result as that which is overtly sexual, as long as they would not have occurred but for the sex of the target.

This is exemplified by the incidents complained of in the case at bar. Hostility against Plaintiff took several forms. Those of an overtly sexual nature included depictions of unclad women. However, Vivienne Rabideau was also called demeaning names, such as "fat ass". Merely because these appellations may not have been sexual, does not mean that they were not sexist. As recognized by the D.C. Circuit, photos of unclad



women in the workplace have the same goal as calling petitioner a "fat ass" or of forbidding petitioner to take male customers to lunch. They are all designed to keep women in their place.

The Sixth Circuit further erred by holding that a woman entering those environments with the greatest amount of overt hostility should be required to endure it. To equate, as the Sixth Circuit did, sexual displays on television and newsstands with pinup posters and misogynous language in the workplace ignores certain verities. An individual is free to refuse to buy an offending magazine and is able to turn off the television set. The selection of a job is not that simple and involves competing values. It is not merely a case, as the Sixth Circuit described, of voluntarily entering the offending work

environment. If blue collar jobs pay better than clerical positions, a woman should not have to trade her right to a better paycheck and benefits, in order to work in an environment which does not require her to look daily at a picture of a man playing golf while poised near a naked woman's breasts.

"Sexual harassment which creates a hostile or offensive environment for members of one sex is every bit the arbitrary barrier to sexual equality at the workplace that racial harassment is to racial equality. Surely, a requirement that a man or woman run a gauntlet of sexual abuse in return for the privilege of being allowed to work and make a living can be as demeaning and disconcerting as the harshest of racial epithets." Henson v Dundee, 682 F.2d 897, 902, 29 FEP, 787, 791 (11th Cir. 1982)

If women are strangers to the assembly line, they are equally new to the board room. The test as set forth by the Sixth Circuit amounts to institutionalizing class or economically based distinctions,

with women in factories entitled to less protection than those in offices, or in more highly-paid professional or executive positions. Yet these may be the women most in need of the court's intervention.

In a seminal study, James E. Gruber and Lars Bjorn, professors of sociology at the University of Michigan-Dearborn analyzed Blue-Collar Blues: The Sexual Harassment of Women Autoworkers (hereafter, Gruber & Bjorn) (Appendix A).

They

"found that blacks, non-married, or young (under 25) women, or those with low job status or who worked in an area where women were a sizable minority were more likely to be the targets of frequent harassment..."

Contrary to the assumptions implicit in the Sixth Circuit's analysis, in situations where women enter a formerly

male dominated occupation, sexual harassment is likely to come, not only from supervisors from whom traditional quid pro quo harassment generally emanates, but also from coworkers. Schreiber, Carol, Changing Places. Men and Women in Transitional Occupations. (M.I.T. Press 1979). Where women have similar jobs and earn similar wages as men, male co-workers may use sexual harassment as a device to enable them to put women into a less threatening traditional role.

"A major driving force behind sexual harassment is not sexual lust or desire, but rather sexual domination: it is an attempt by men to maintain culturally-legitimated power and status differences that have traditionally been the products of gender stratification."

Gruber and Bjorn,
Appendix at 2.

While hostile environment sexual harassment may have sexual overtones, its primary purpose is not seduction. It is the gender analog of the workplace where Blacks are the target of racial epithets, or Jews the focus of Nazi memorabilia. Accordingly, there is no reason to treat victims of sex discrimination any differently from those who suffer from other forms of discrimination.¹

¹ The only difference is due to one aspect of the socialization of women, which leads many to internalize their objections, an attitude which may be confused with acceptance of their situation. According to Gruber and Bjorn,

"Sexual harassment is interesting with regard to these two variables: it does not seem to adversely affect most women's behavior at work, their perceived competence with regard to their jobs, or their ability in general to make plans or to get things done; at the same time, there is



In no other area of employment discrimination law has the morality of the actors been a basis on which to excuse their actions. This approach has no place in our jurisprudence, as it creates a sliding scale of liability, where those guilty of the most abominable acts may be excused because those acts had always been part of the work environment, or had been part of the background of the actors.

This Honorable Court, in Meritor Savings Bank v. Vinson, _____ U.S. _____; 40 FEP Cases 1822, 1826-1827 (1986), signalled that a hostile work environment based on sex should be

evidence that a number of harassed women in our sample go about their lives feeling relatively unhappy with themselves and with the quality of their lives." Appendix at 27.



treated in the same manner as prescribed in an established body of law prohibiting a hostile work environment directed against racial or ethnic groups. Certain cases cited in Vinson demonstrate that neither the background of the perpetrators, nor the customs of the industry suffice to excuse racially-or ethnically-based discriminatory acts. Further, the Rabidue court, by looking to a reasonable person, rather than to a reasonable woman, strangely focused on the effect on all workers, rather than on the persons targeted by the acts. This appears to be unprecedented.

Thus, in Rogers v EEOC, 454 F.2d 234; 4 FEP Cases 92, 95 (5th Cir. 1971), cert. den., 406 U.S. 957,² acknowledged by the Chief Justice as "apparently the

² Rogers recognized that the segregation of Hispanic patients created a discriminatory environment hostile to Hispanic employees.



first case to recognize a cause of action based upon a discriminatory work environment," Vinson, supra, at 1826, the Fifth Circuit noted that Title VII was aimed at the eradication of an environment "polluted with discrimination," which would "destroy completely the emotional and psychological stability of minority group workers." Rogers, supra, at 95. Since those creating the discriminatory atmosphere are obviously comfortable with what they have accomplished, if their desires are permitted to form the pattern against which culpability is determined, the hen-house door will be forever open for the fox.

Indeed, in Firefighters Institute for Racial Equality v St. Louis, 549 F.2d 506; 14 FEP Cases 1486, 1493 (8th Cir. 1977), cert. den. sub nom., also



cited with approval in Vinson, Blacks were excluded from supper clubs which were informal eating arrangements for firefighters while on duty. The City of St. Louis provided the cooking facilities, and acknowledged that it knew of the segregated eating arrangements. However, the City protested that it was unable to solve the problem. Implicit in that protest appeared to be the concern that racial tensions might impact unfavorably on the ability to fight fires.

The Eighth Circuit responded to these arguments by rejecting them. The supper clubs were required to stop operating in a discriminatory and segregated manner. If Rabidue had been applied to this situation, the segregation would have continued. If Rabidue had been applied to segregated



schools, "separate but equal" would still be the law of this land.

The pervasiveness of conduct does not excuse it. Otherwise, the more one discriminates, the less culpable the actor -- as long as the discrimination is based on sex. This is not asking the Court to engage in social legislation. The law has already been established. What the Sixth Circuit did in Rabidue was to judicially legislate an exception to this established law. It has effectively made an employee's endurance of sexual intimidation a permissible "condition" of employment, a result completely contrary to the legislative language. Title VII of the 1964 Civil Rights Act, 42 USC Sec. 2000 e; the Michigan Elliott-Larsen Civil Rights Act, MCLA 37.2101.

In a hostile environment case, it make no sense to require the complaining

employee to demonstrate notice as a separate element, or to base the requirement of notice on whether the perpetrator was a supervisor or co-employee (which also raises the question of what standard is applicable when one supervisor complains of the actions of another). If the situation is sufficiently pervasive to constitute a hostile environment, Rogers, supra, then the employer should have known. By definition, a hostile environment will not ordinarily consist of an isolated one-to-one conversation behind closed doors. The employer who does not know about lewd photographs decorating the workplace should not be rewarded for its see-no-evil attitude by finding no culpability. This latter approach is the other side of the coin of permitting the most hostile environments to violate the

law. Just as the Sixth Circuit would require those employers whose workplaces have the least amount of demonstrable anti-female animus to be the most vigilant, Rabidue would also reward those who fail to supervise their workplaces to rid them of the vestiges of discrimination.

By adding to the burden of those suffering from hostile environment sex-based discrimination, requirements which are not imposed on other victims of discrimination, the Sixth Circuit is sending a message to employees that sex discrimination is neither serious nor important. It is a tacit acceptance that "boys will be boys." That is neither the message Congress intended, nor the message which will permit women to give our country the full benefit of their productive efforts.



CONCLUSION

For these reasons, this Court's discretion and power of supervision should be exercised, and a writ of certiorari issue.

Respectfully Submitted,

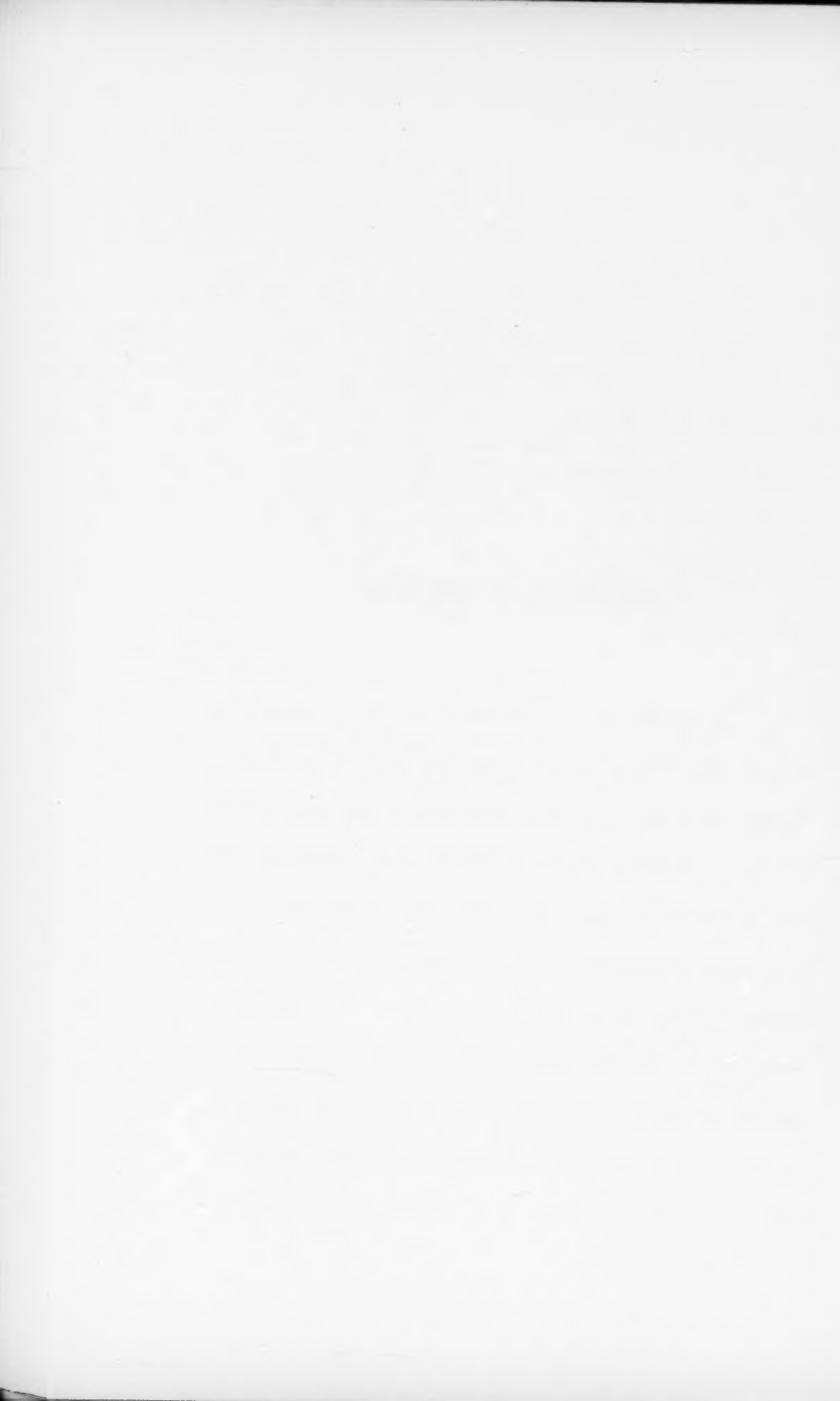
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STATE OF MICHIGAN)) ss
COUNTY OF OAKLAND)

AFFIDAVIT OF SERVICE

I, LYNN H. SHECTER, hereby certify that on this 1st day of April, 1987, three copies of the PETITION OF MICHIGAN TRIAL LAWYERS ASSOCIATION FOR PERMISSION TO FILE AS AMICUS CURIAE were mailed postage prepaid, to Seth M. Lloyd, and M. Beth Sax, Dykema, Gossett, Spencer, Goodnow & Trigg, 35th Floor, 400 Renaissance Center, Detroit, Michigan 48243, counsel for the respondent herein, and to Barbara A. Klimaszewski.



Klimaszewski & Street, 1500 East Genesee,
Saginaw, Michigan 48607, counsel for the
petitioner herein. I further certify
that all parties required to be served
have been served.

Respectfully Submitted,

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Subscribed and sworn to before me
this 1st day of April, 1987

NOTARY PUBLIC
Macomb County, Acting in Oakland
County, State of Michigan
My Commission Expires: 7/17/88



APPENDIX A

BLUE-COLLAR BLUES:

THE SEXUAL HARASSMENT OF WOMEN AUTOWORKERS



BLUE-COLLAR BLUES:

THE SEXUAL HARASSMENT OF WOMEN
AUTOWORKERS*

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* An earlier version of this paper was presented at the 1981 Meeting of the American Sociological Association in Toronto. We would like to acknowledge the research assistance of Bruce Reading and all those unnamed women at our research site. We would also like to thank the Horace Rackham School of Graduate Studies at the University of Michigan-Ann Arbor, and the Campus Grants Committee, University of Michigan-Dearborn, for their financial assistance.

Abstract

Harassment frequency, severity, response and effect were analyzed for a sample of 183 women who work mostly in unskilled jobs in the auto industry. It was hypothesized that these would be related to several social and work-related characteristics: specifically low social or work status, or low numerical representation in a work area. Our analysis found that blacks, non-married, or young (under 25) women, or those with low job status or who worked in an area where women were a sizable minority were more likely to be the targets of frequent harassment. Black women, or those who were a sizable minority in a work area, were also likely to be severely harassed. Harassment response, however, was not



related to either social or work-related characteristics. In other words, women who are the targets of harassment do not respond differently than women who are less frequently or severely harassed. Several consequences of sexual harassment were found. Feelings toward co-workers and supervisors were adversely affected by harassment; overall job satisfaction, feelings of job competence, and work mobility aspirations were not influenced. Finally, there was some evidence that harassment generalized beyond the workplace: harassed women reported lower self esteem and experienced less global life satisfaction.



Blue-Collar Blues:

The Sexual Harassment of Women Autoworkers

This paper is a study of the sexual harassment of women who work on the assembly line in the auto industry. We focus upon three areas: the targets¹ of frequent and severe harassment; the responses to harassment; and the attitudinal and behavioral consequences of harassment. Women in the auto industry have been selected as the focus of our research for several reasons. First, there is still a considerable lack of research on women in blue-collar jobs, a state of affairs about which several

¹ We use the term "target" throughout this paper to mean that harassment is not a random or ubiquitous phenomenon. "Target" suggests the non-random nature of harassment and implies that we can predict which types of women are likely to be harassed.

authors have expressed concern in recent years (Roby, 1975; Kanter, 1977; Baker, 1978). A few notable exceptions have recently emerged: McIlwee (1980), Walshok (1981), O'Farrell and Harlan (1980), Riemer (1979), and Riemer and Bridwell (forthcoming) -- all of whom study women that are in, or else training for, skilled labor or trade jobs. Second, auto work is a male-dominated occupation -- only 10% of all Michigan autoworkers are women (Sexton, 1976). Women in this occupation, in contrast to those in clerical work, for example, are likely to be highly visible and viewed as "outsiders" (Kanter, 1977). In such a situation sexual harassment is likely to come not only from supervisors but also from coworkers who constitute a sizable majority of workers (Meyer and Lee, 1978, Schrieber, 1979). Third, auto



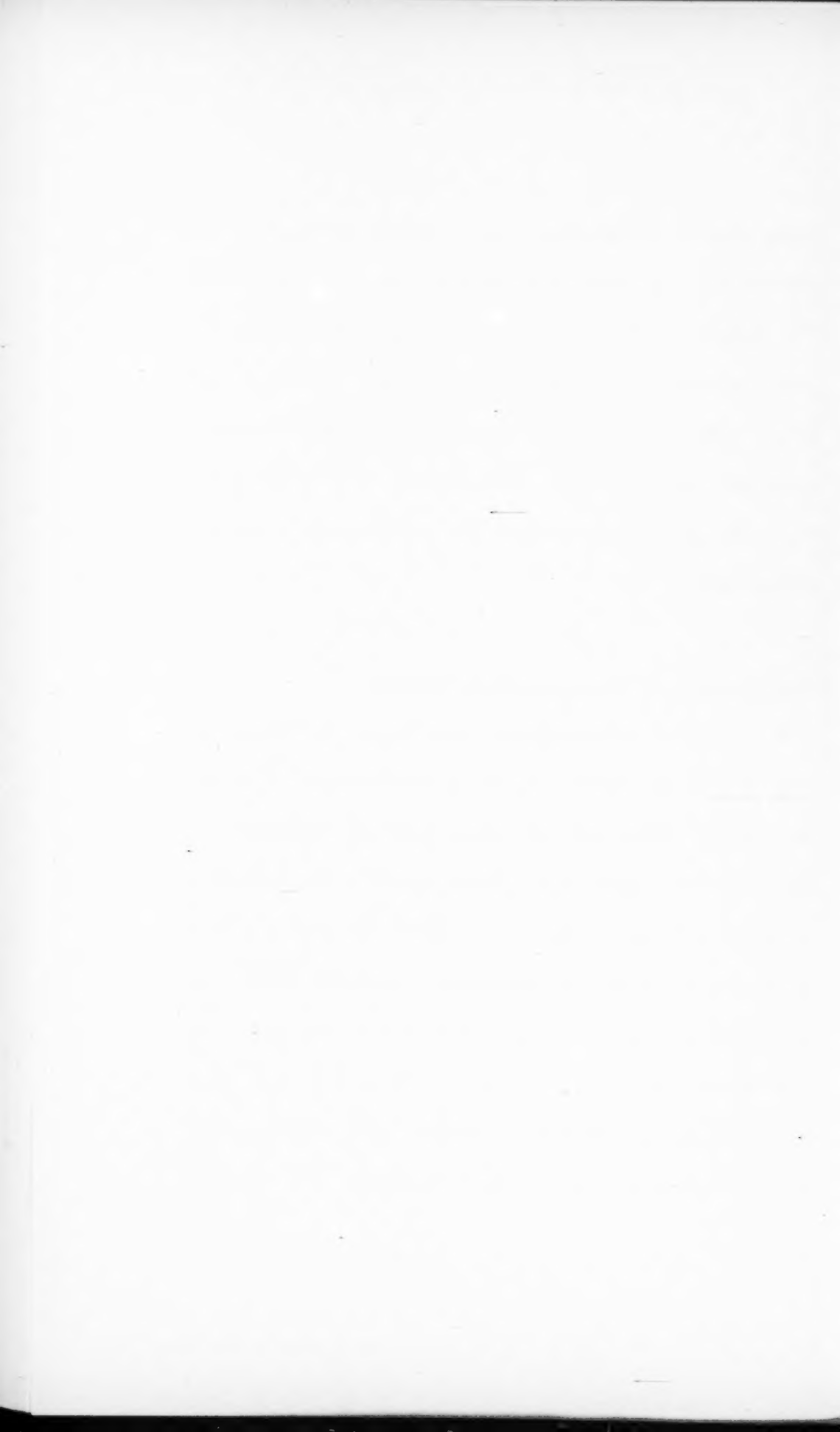
work is a high paying occupation. It is unlikely that an unskilled assembly worker, whether male or female, could easily find another job that pays as well. A woman who perceives a lack of mobility, or who feels that a better or comparable job would be difficult to find, is apt to be especially sensitive to the effects of sexual harassment (Silverman, 1976). Fourth, male autoworkers are apt to feel threatened not only by the "invasion" of women into the auto plant, but also by the fact that these women have similar jobs and earn similar wages. In situations where objective work conditions do not result in the subordination of women, it is quite likely that sexual harassment will occur as men attempt to regain an upper hand (Benson and Thomson, 1980; Walshok, 1978). This is likely to be the



case since unskilled male auto workers, in contract to men in craft or trade jobs (Riemer, 1979; Riemer and Bridwell, forthcoming; McIlwee, 1980) or in police work (Martin, 1980) cannot effectively punish women by refusing to provide valuable work-related information or training.

The Types of Sexual Harassment

Sexual harassment has been defined by the Working Women United Institute (1978) as "any repeated or unwarranted verbal or physical sexual advances, sexually explicit derogatory statements, or sexually discriminatory remarks made by someone in the workplace which is offensive and objectionable to the recipient or which causes the recipient discomfort or humiliation or which



interferes with recipient's job performance." A major driving force behind sexual harassment is not sexual lust or desire, but rather sexual domination: it is an attempt by men to maintain culturally-legitimated power and status differences that have traditionally been the products of gender stratification (MacKinnon, 1979). The paradigm that women are prostitutes provides additional insights: in a society where women are subjugated, their survival is hinged on their ability to provide sexual favors or to be passive sex objects in exchange for economic or social rewards (Silverman, 1976). It has been argued, for example, that men are so accustomed to viewing women as sex objects that they often find it difficult to accept them as co-workers (Bell, 1976).



One general survey found that two-thirds of reported harassment is verbal in nature (WWUI, 1978). The suggestion has been made, however, that physical harassment may be more of a problem for blue-collar women than for others (Silverman, 1976). Empirical evidence for this hypothesis is still weak, however, given the paucity of research on blue-collar workers. We do know that the specific forms of harassment vary from the relatively moderate (e.g. whistling, using profanity) to the severe (e.g. physical assaults, sexual bribery). Riemer (1979), for example, finds that while verbal attacks are the most frequent forms of abuse in the building construction industry, physical attacks, including rape, also occur. A study of women working in, or training for, male-



dominated non-professional occupations described "overt harassment" (teasing, ridicule, sabotage) as the most common type of interactional problem (McIlwee, 1980). Approximately one of every five problems mentioned in her study involved behavior with explicit sexual overtones (come-ons, sexual cracks, and physical attacks). A basic descriptive element of our research, then, will be to list the types of sexual harassment encountered by blue-collar autoworkers: we expect verbal abuse to be more frequent than other types of harassment. A more specific question which we will address that has not received extensive research investigation is this: Are some types of women more likely to be the victims of frequent or severe harassment than others?



The Targets of Sexual Harassment

Several early studies suggested that harassment is a ubiquitous phenomenon which cuts across age, race, marital status, and occupational distinctions; the factors viewed as being primarily responsible for this prevalence are the minority-group status of women in our society, and the organizations subordination of working women (Lindsey, 1976; Bernstein, 1976; Brodsky, 1976). Recent research studies, however, find that specific categories of women are targeted for harassment. Age (Safran, 1976; Riemer and Bridwell, forthcoming) and, related, job seniority (McIlwee, 1980; Martin, 1980) have been shown to be variables in the occurrence of harassment. Women in their 20's, or more specifically, women who are "breaking in" to a job or



career, are frequently the victims of harassment. This is especially true where women are a highly visible minority in the work area (Kanter, 1977; Meyer and Lee, 1978). Race may also be a factor in harassment -- it has been suggested that blacks may be the targets of harassment more often than whites because of the cultural and economic marginality and vulnerability of the former (MacKinnon, 1979). In a related vein, the absence of a relationship with a man (friend or spouse) may make a woman seem more vulnerable, and therefore increase her chances of being harassed (Benson and Thomson, 1980).

These studies suggest that certain social characteristics (e.g. age or race) as well as certain structural or work-related situations (e.g. being a



subordinate, being part of a numerical minority, being "out of role") are associated with the occurrence of harassment. With this in mind, we have selected three social characteristics (age, race, marital status) and three work-related factors (seniority, job status within the plant, and percentage of women in the immediate work area) as indicators of different status dimensions. We predict that women with lower status will be the targets of frequent and severe harassment, namely: black, young, or "unattached" (single or divorced) women, as well as those who have low seniority or job status, or who work in an area where they are a distinct numerical minority.

Responses to Sexual Harassment

Research studies indicate that a typical response to harassment is to ignore it or to act as if it had no effect (MacKinnon, 1979; Riemer and Bridwell, forthcoming; Farley, 1979; Lindsey, 1976). Women frequently stated that the harassment would continue if men discovered their actions were having an effect (Silverman, 1976; Benson and Thomson, 1980). McIlwee (1980) and Walshok (1981) found that indirect methods of dealing with interactional problems (e.g. over-achievement, accommodation, withdrawal) were widely used strategies that had an effectiveness over the long term for reducing harassment. Indirect methods, however, are problematic insofar as harassment is likely to be repeated (Silverman, 1976; Walshok, 1981) and frequently to cause psychological problems



(Reimer, 1979; Silverman, 1976). Though the skilled blue collar women in her study were reluctant to sue direct or confrontational methods, Walshok (1981:237) notes that these were usually an effective means of terminating the harassment. The preference for indirect tactics seems to be prevalent among women for several reasons. First, indirect or nonassertive tactics may allow a woman to manage the "trouble" in a situation without disrupting the work setting and the relationships between herself and other workers (Emerson and Messinger, 1977; Goffman, 1967). Second, women may use indirect methods because more direct or assertive methods, which involve greater risk or uncertainty, are often perceived by women to be ineffective (Silverman, 1976). Since they frequently



have to complain "through channels" to other men about sexual harassment, women often discover that their complaints are not taken seriously (Farley, 1979; Lindsey, 1977). Finally, labeling incidents as instances of sexual harassment may be problematic because of an element of sexual attractiveness which may sometimes be involved in these situations. Zuckerman (1975) notes that harassment incidents are often ambiguous because of the combination of sexual interest and offensive behavior. This ambiguity subsequently reduces a woman's ability to respond in an assertive or direct manner.

While the research literature shows that responding to sexual harassment in an effective, direct manner is problematic for women as a group, there is not study



which explores the question of whether there are systematic response differences among women -- specifically, whether women who are the targets of frequent or severe harassment respond differently than others. We would argue that just as some women are more apt to be harassed because they are perceived as having less status, it is likely that these same women will respond less assertively than others. More specifically, we predict that the types of women who are targeted for harassment are also the ones who respond less assertively to harassment.

Consequences of Sexual Harassment

With regard to the consequences of sexual harassment for work life, most research has been done on the effects of the quality of interaction with co-workers



and supervisors. In one study, harassment had a strong negative impact on satisfaction with co-workers, and weaker, though significant relationships to satisfaction with (in rank order): supervisors, promotions, and work content (O'Farrell and Harlan, 1980). Work performance may in some instances be adversely affected by sexual harassment. Police work is an example of this: the exclusion of policewomen from informal social interaction networks which results from sexual harassment denies them the feedback that is necessary for successful job performance (Martin, 1980). However, in other occupations, where informal interaction is not a prime factor in obtaining job skills, sexual harassment apparently has little effect upon either a woman's job performance or her job



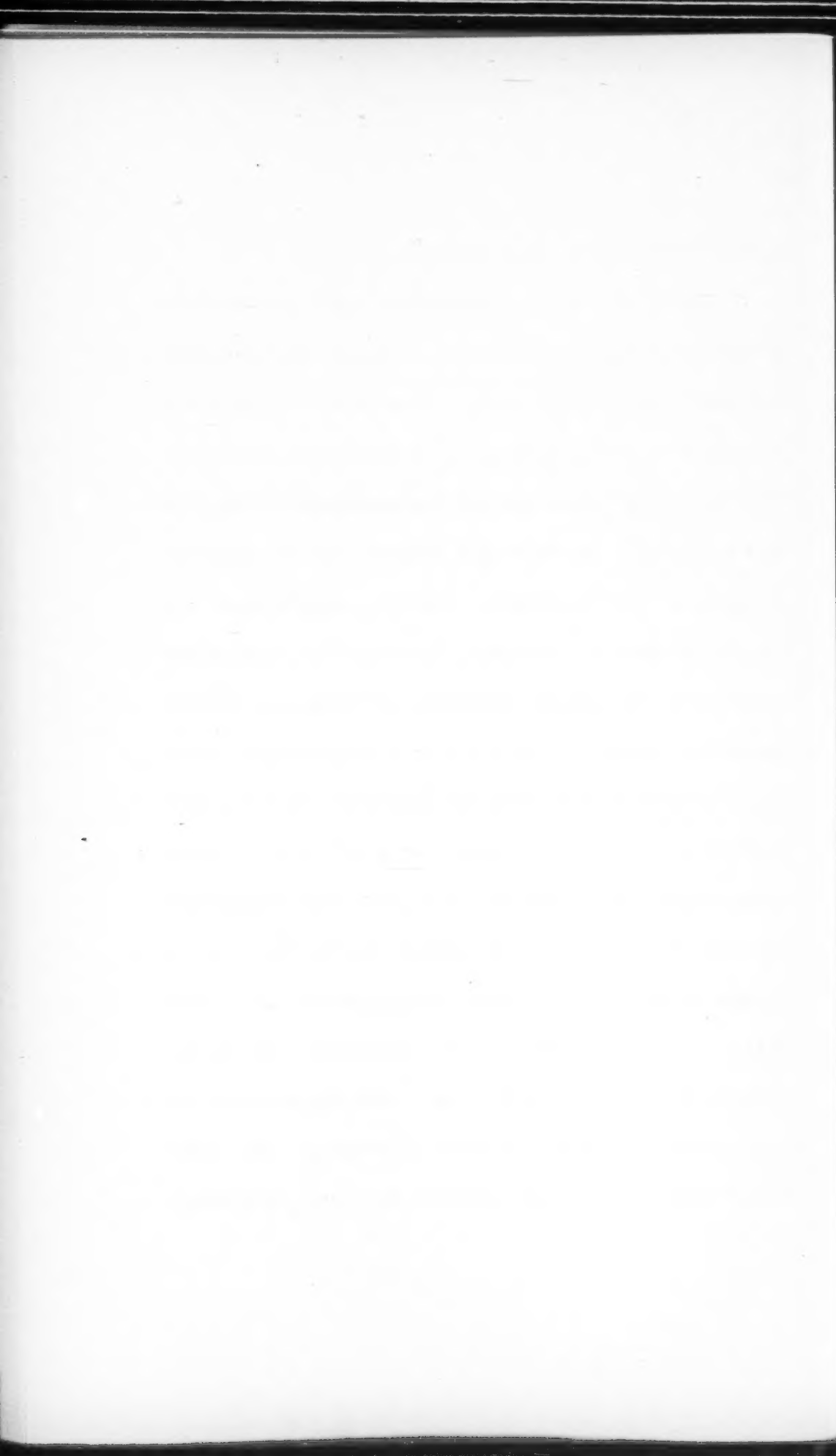
tenure (McIlwee, 1980).

These studies of the impact of sexual harassment on work life suggest that areas of work life governed by informal rather than formal rules are more likely to be affected by sexual harassment. Subsequently, we hypothesize for our sample of unskilled auto workers that sexual harassment will be most likely to have consequences for informal relations with co-workers or supervisors, and least likely to have consequences for those areas of work life governed by formal union-management rules: extrinsic regards, job mobility, control of work, and work content (work competence and intrinsic rewards). We also advance the following corollary hypothesis: sexual harassment is more likely to have consequences for work attitudes than for work behaviors (see



also: O'Farrell and Harlan, 1980).

We will also address the possible generalizing effects of sexual harassment beyond the workplace. Previous research suggests that women psychologically "carry" the effects of harassment from the workplace. Although anger is a common response (Silverman, 1976), feelings of inner turmoil, fright, and guilt are also reported by large numbers of women. Other harmful psychological consequences from harassment are shown by Lindsey (1977) and Safran (1976), who argue that the resulting depression, anxiety and migraine headaches are directly related to a woman's pride in, and enjoyment of, her work. These empirical studies do not, however, go beyond the enumeration of stressful psychological states. We find more theoretical guidance for our research



in the existing literature on the possible generalizing consequences of work alienation (e.g. Kornhauser, 1958; Kohn and Schooler, 1973; Sennett and Cobb, 1972). The two central social-psychological dimensions in this literature are perceptions of self-identity (self-estrangement) and control (powerlessness). Since these two dimensions are also touched upon in discussions of what motivates harassers, it would be of interest in any general theory of sexual harassment to know to what degree they are also relevant to the experiences of harassment victims. Following Sennett and Cobb's (1972) discussion of the reactions of (male) American blue-collar workers to unequal treatment, we predict that women workers are more likely to react to sexual



harassment with doubts about self-identity (self-esteem) than with concerns for lack of control (especially personal).

Another issue is the range of social behaviors beyond the workplace that are affected by sexual harassment. In our study we will explore this relationship by examining the relationship between sexual harassment and satisfaction with work, family/home and life as a whole. We follow O'Farrell and Harlan (1980) in predicting that sexual harassment will have small or negligible effects on global job satisfactions, and consequently we would also expect sexual harassment to have small or negligible effects on satisfaction with life as a whole.



DATA

A final assembly automobile plant, which had not experienced lay-offs in the recent recession, was selected for our study. The large majority of blue-collar women at the plant work in unskilled job classifications, more specifically in assembly and sub-assembly operations. Women are not only absent in the skilled trades, but also in some departments in the plant. In the remaining departments, women comprise varying proportions of the work force, ranging from 6% to 25%. The plant-wide proportion of women is approximately 10% of a total of 5,200 blue-collar workers.

Given the varying sex-ratios, we decided to sample all women in four departments with widely differing sex ratios. We also chose this sampling strategy on practical grounds. Since we

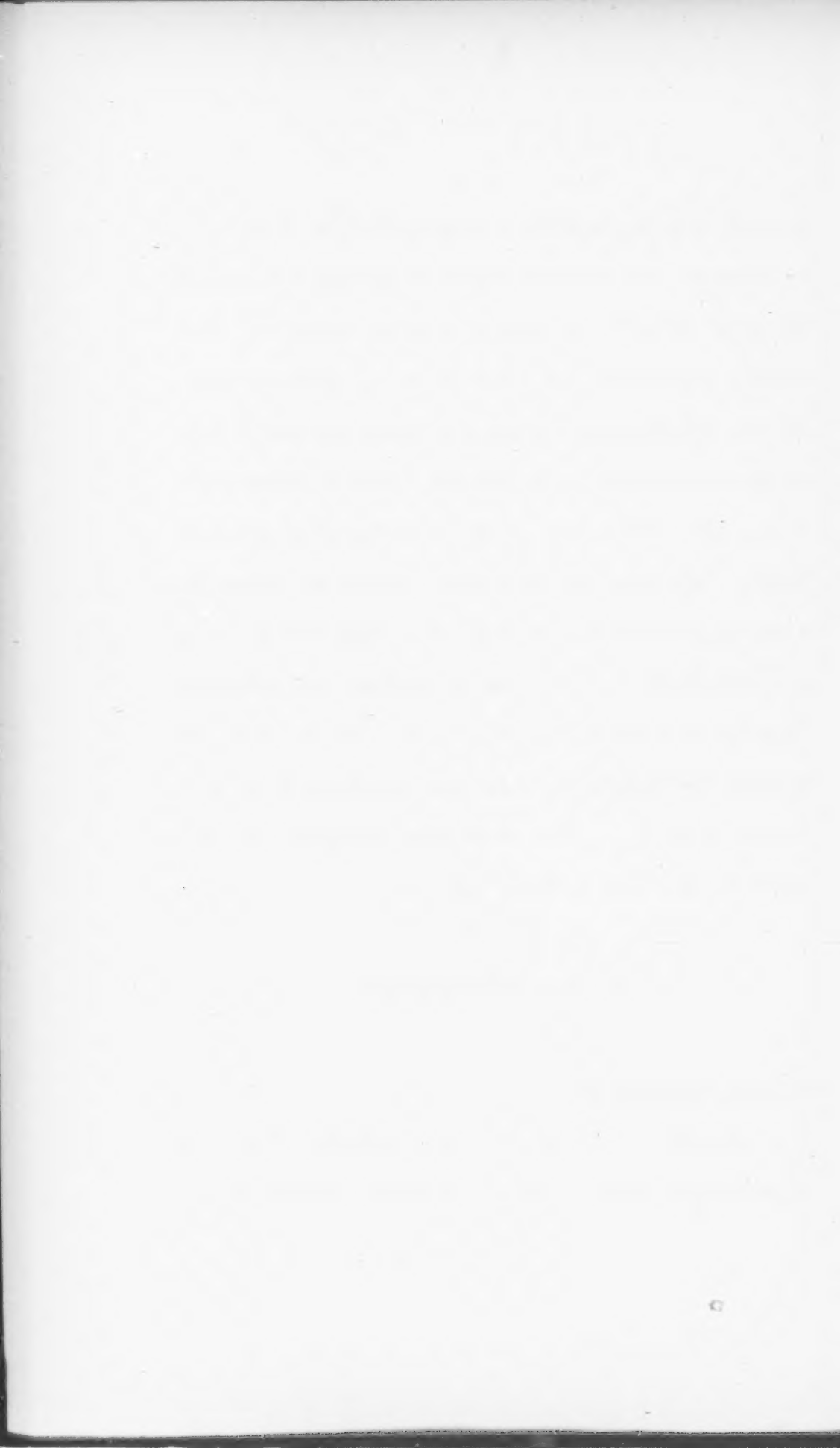


laced management cooperation for our research, we relied upon a group of women in the plant to generate a list of all women working in the four departments. After excluding those workers we were not able to contact by phone, their response rate was 74%. Our sample consists of 138 women and they were interviewed at home by women interviewing in 1980-81. A questionnaire covering a number of job-and family-related topics in addition to sexual harassment, was administered to the respondents. The average length of the interviews was 1.5 hours.

VARIABLE MEASUREMENT

Sexual Harassment

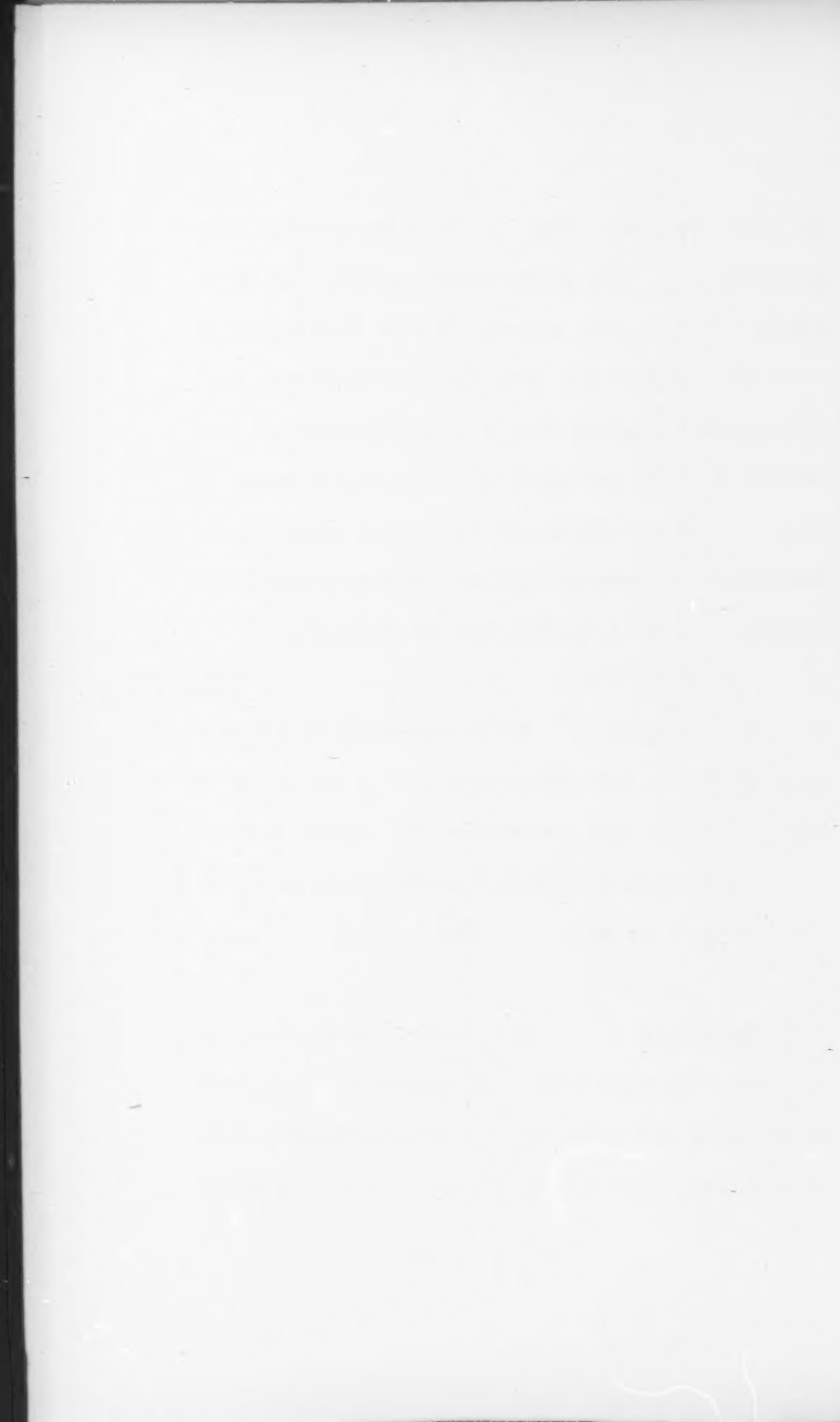
Each respondent was asked "Do you experience any type of sexual harassment



on your present job?" If the answer was affirmative, two open-ended questions were asked: the first asking for a description of the harassment and the harassers, and the second asking for a description of "an incident that sticks out in your mind." Based on the responses to these questions, measures of the frequency and severity of harassment were developed as follows:

Frequency. This variable measures the number of harassment incidents mentioned by the respondents. The number of incidents mentioned varies from zero to six, with a mean of 1.1 incidents.

Severity. A content analysis of the two open-ended questions yielded eleven types of sexual harassment, for which we found a high inter-coder



reliability. To arrive at a measure of the severity of harassment these eleven types were ordered into three degrees of severity as follows: "Low" (vulgarity; profanity; lewd jokes; stories); "Moderate" (sexual propositioning; spreading malicious rumors about the respondent; sexual innuendos about the respondent's body, sex activity or sexual preferences); and, "High" (physical advances; sexual bribery). In instances where more than one harassment incident was reported, the most severe type was selected to represent this variable. ²

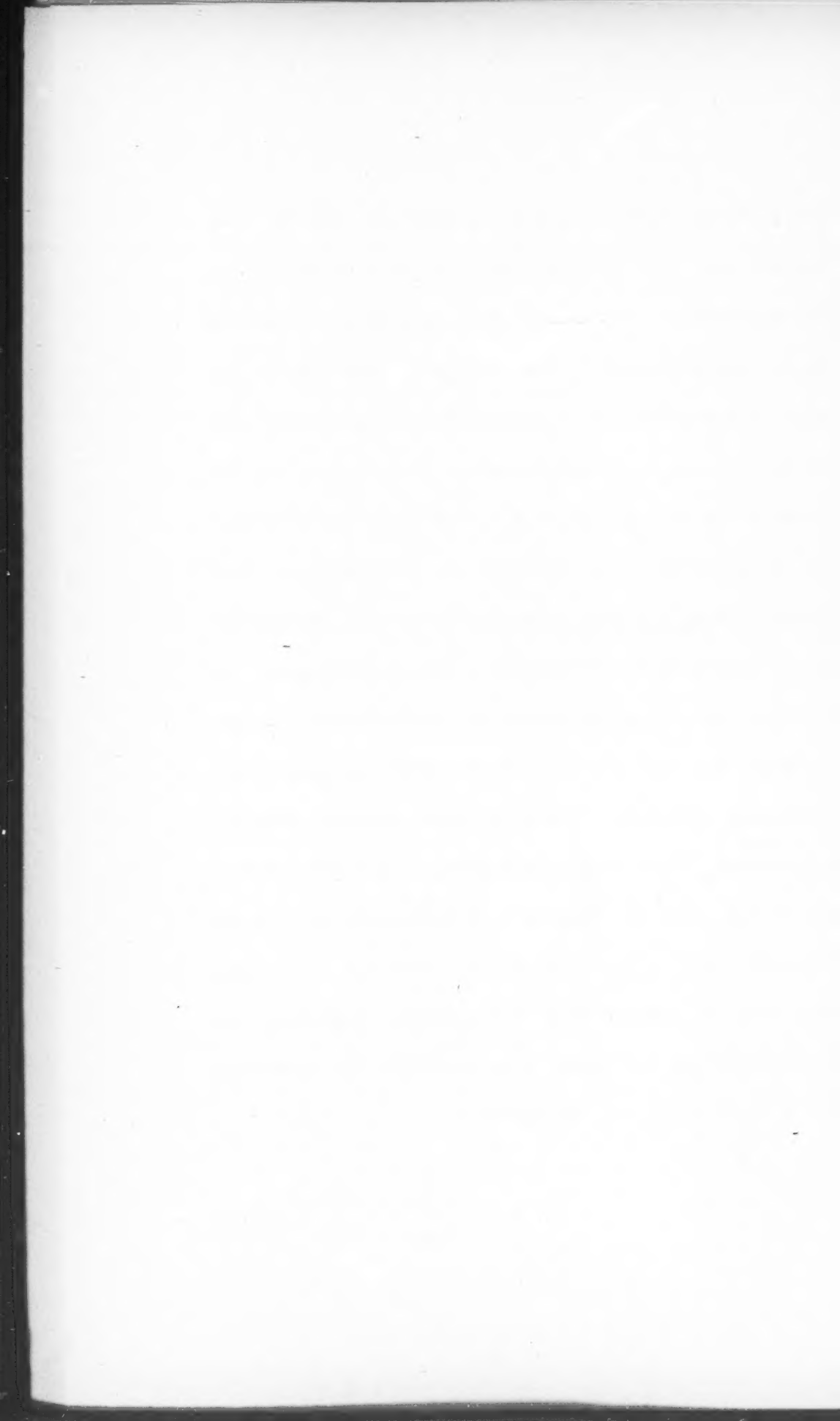
Response

The measure of the responses to sexual harassment was based on the

² Based on Scott's (1955) formulation our intercoder reliability was .92.



following open-ended question which was asked to all respondents who reported harassment: "How do you normally handle this harassment?" A content analysis of the answers yielded eleven ways of responding to harassment, for which we found a high level of inter-coder reliability. A variable measuring the directness of the response to the harasser or harassment incident was developed by ordering the eleven types into three levels as follows: "Passive" (ignoring; walking away); "Deflective" using humor; stalling, telling co-workers or friends; giving mild verbal responses); and "Assertive" (launching a verbal attack; making a physical response; taking or threatening to take the matter to someone in a position of authority).



Determinants of Sexual Harassment

Six variables were used as independent variables in relation to sexual harassment, three of which measure social characteristics workers bring to the work situation: age, race, and marital status; and three of which measure work-related characteristics: seniority, work area sex composition and job status.

The median age of women in the plant was 30 and about two thirds were white. With regard to marital status, our sample was relatively evenly divided among married, divorced, and single women.

Plant seniority ranged from three months to twelve years with a median of two years. To measure work area sex composition we asked: "About how many people work in your immediate work area?", and "How many of these people are women?"

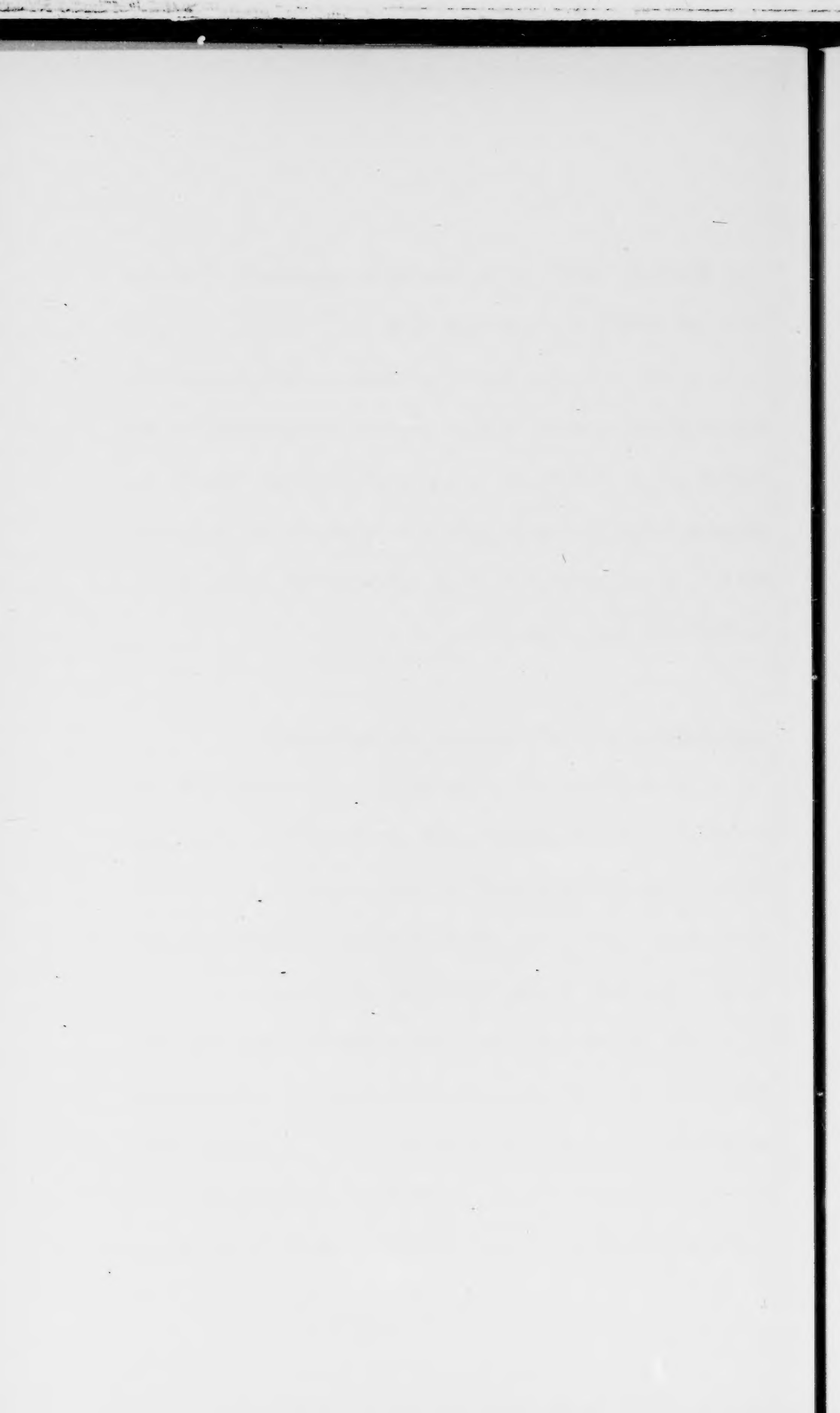
We found that the median percent female in the work areas was 27%.

The job status variable was based on questions which first asked respondents to rank six jobs in the plant and then to place their own job in the rank order. Each respondent was assigned the rank order of her own job.

Consequences of Sexual Harassment

A number of possible consequences of sexual harassment was explored, ranging from the relationship between the worker and her job, or her social relations at work, to her life outside of work.

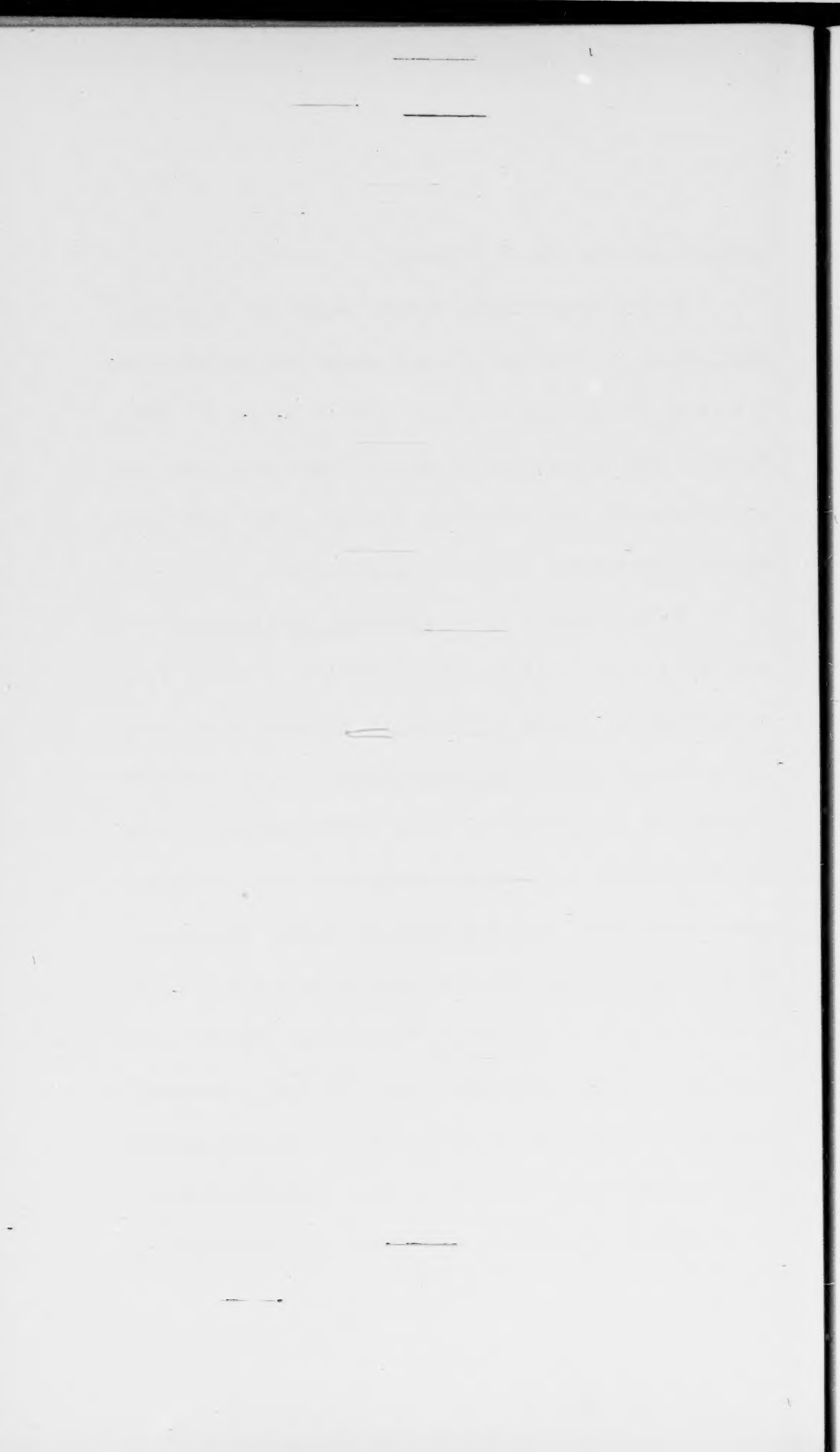
To measure various dimensions of the worker's job satisfaction we employed standard survey items for global job satisfaction (two items); intrinsic job satisfaction (four items); and extrinsic



satisfaction (two items).

Five questions were used to tap job mobility. Two of these were satisfaction items dealing with promotion. Two questions were asked about aspirations to supervisory or skilled trade jobs and one about desiring any different job.

With regard to social relations at work four questions were used for relations with co-workers and one for relations with supervisors. Two of the items on co-workers were attitudinal; one on feelings toward co-workers in the work area and one on chances to make friends. The other two items measured behavior towards co-workers: talking with co-workers while working, and during breaks. For relations with supervisors we asked "How would you describe the relationship between yourself and your supervisor?,"



followed by probes on "fairness" and "getting along."

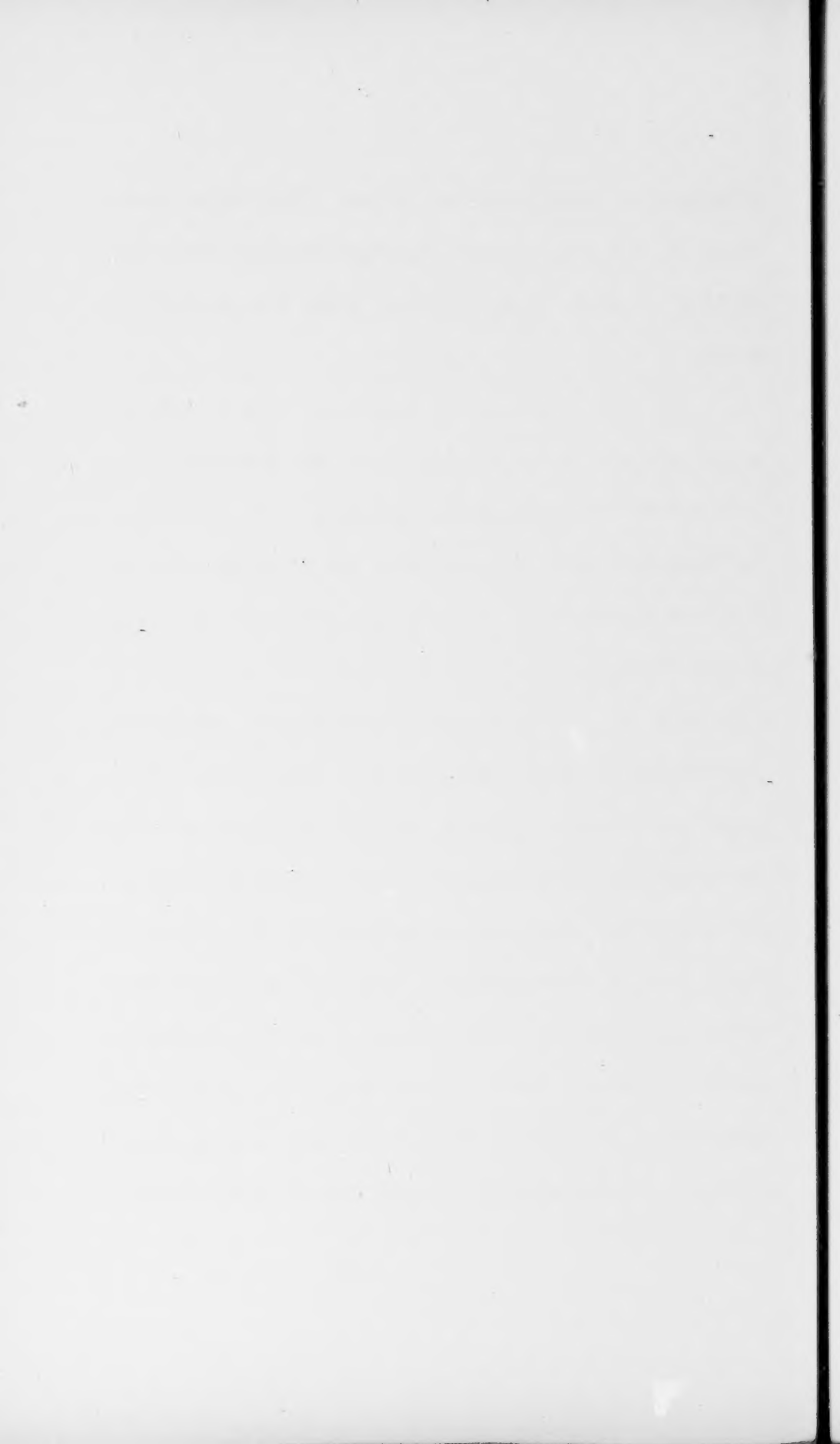
Other work related consequences measured were: control over work situation (ability to "influence what happens to me at work"); work competence (items on enough time to do the job and on physical handling); and view of work role (items on "work as a necessary evil" and work centrality).

Non-work consequences measured by our instrument included items on life satisfaction and satisfaction with home or family life. Self-esteem was measured by an item on feelings of "uselessness." Feelings of political efficacy were tapped by items on "say about what the government does" and on politics being "too complicated." Finally, three items were used to measure dimensions of personal

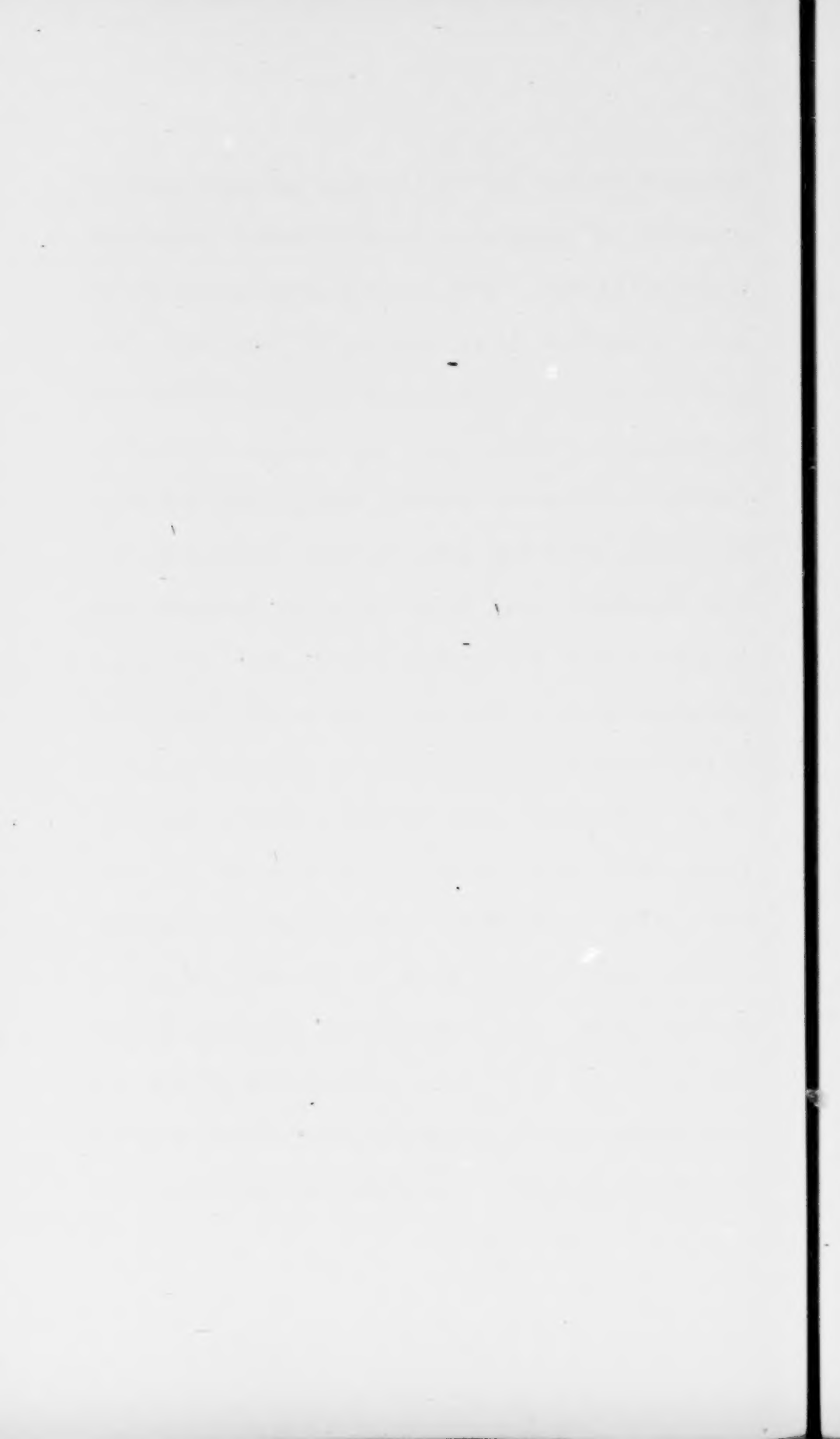
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control: influence over "things that happen to me"; happenings being "my own doing"; and that plans can be made to work.

It is our contention that these attitudinal variables can be accurately viewed as consequences of sexual harassment and not simply as correlates of harassment. This posture seems justifiable on the basis of previous research. Several general sexual harassment surveys, which specifically queried women about their reactions to harassment incidents, found that a number of psychological changes (e.g. anger, fear, self derogation) directly resulted from harassment (Silverman, 1976; Safran, 1976; Linsey, 1977). Other more rigorous empirical studies, which do not focus upon sexual harassment, show that attitudes



toward work or Self are oftentimes a product of specific work-related problems or conflicts. Two well-known studies of male workers that directly address the question of causality are those of Kornhauser (1958) and Kohn and Schooler (1973). Several recent empirical studies of women provide additional support for the argument that work-related factors are significantly related to social psychological states, such as feminist orientation or intrinsic satisfaction (e.g. O'Farrell and Halran, 1980; Ferree, 1980; McIlwee, 1980). While we do not deny the fact that social psychological states may often play a causal role in social life, our concern is to ground our research within the existing body of knowledge which suggests that such states are more properly treated as outcomes or

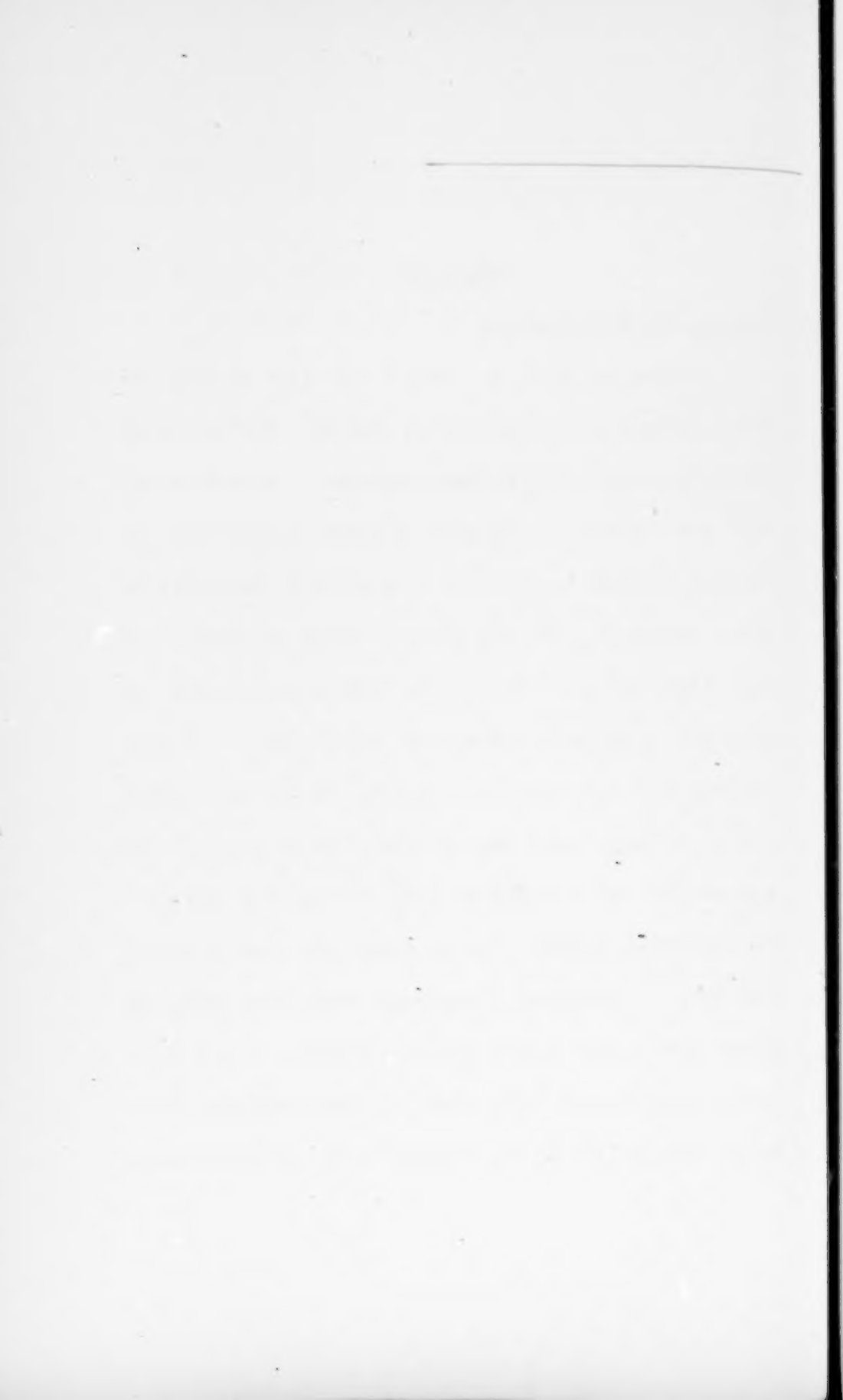


consequences.

RESULTS

Types of Harassment

Over a third (36%) of the women in our sample reported that they had experienced sexual harassment. A total of 160 harassment incidents were reported by these women. Seven types of incidents each account for at least five percent of all incidents. The most prevalent type is sexual propositioning (28.1%). This category typically involved situations where a man, who would not "take no for an answer" or would not "take a hint" badgered a woman for a date or for sexual favors. Abusive language was the second most frequent type of problem: this not only includes the use of profanity, but more frequently it represents situations



where "off-color" jokes or remarks were made about women's bodies or sexual intercourse. Physical attack represents a severe type of sexual harassment. Our figure for this type of harassment (14.4%) is lower than the one-third reported by Silverman (1976) but similar to the proportion (one-seventh) found in Benson and Thomson (1980). Verbal innuendo (9.4%) and body language (5.0%) are, to a large extent, different means of expressing the same message. For example, co-workers made suggestions to women about their sexual prowess in bed or talked openly about their body parts. Remarks in this category, in contrast to those in the verbal abuse category, were specifically aimed at the respondent in a personal manner. Body language is similar in this respect: simulating the movements of



sexual intercourse, or men rubbing their crotches when a women entered the area are two examples of this type found in our data. Social derogation (5.6%) is not found in face-to-face situations-- rather, this form of harassment occurred when a woman's reputation was demeaned by men who spread malicious rumors or stories about her. The final major type of harassment presented in Table I, sexual bribery, represents a situation where the explicit assumption made by a male co-worker was that a woman's sexual favors could be used as a basis of exchange for obtaining rewards. Two general situations were prevalent: one was where a woman was told that she could get a better job or receive a favorable recommendation if she agreed to a sexual liaison; the other was where a woman was offered cash for sexual favors



(e.g. one of our respondents reported that a co-worker pulled \$500 from his pocket and laid it on her work table and said "It's yours anytime you want it"). Implicit exchanges were probably also at hand when supervisors rather than co-workers were the harassers. This was the case in 27% of all harassment incidents, which is a disproportionate amount, given that supervisors comprise 5% of the male population in the plant.

Targets of, and Responses to, Harassment

Two related questions are dealt with in this section: Who are the targets of frequent or severe harassment? and How is harassment handled? That data in Table 2 show that frequency of harassment is influenced by more variables than is



severity of harassment. ³ Our first hypothesis, then, receives more verification with regard to frequency than it does with regard to severity. Though only two variables are significantly related to severity, in contrast to five for frequency of harassment, the percentages of explained variance are quite similar (20.1% versus 25.1%). Race and work area sex composition are significantly related to both frequency and severity. ⁴ In other words, black

³ The intercorrelations among the independent variables ranged from .01 to .23. Two intercorrelations which were near or above .20 were added to the separate regression analyses as multiplicative variables: age x seniority, and job status x seniority. Neither of these made a statistically significant increment to the sums of squares.

⁴ Since the relationship between harassment and sex composition of the work area is curvilinear, the latter variable was recategorized as follows:

women not only receive more harassment than whites ($\beta = .141$), they are also harassed more severely ($\beta = .354$). See Table 2. Previous studies have indicated that women are apt to become the objects of harassment when they are a distinct minority in the workplace. Our findings, however, suggest that women become the victims of frequent (.134) and severe harassment (.313) when their numbers are somewhat proportionate to that of the men. In other words, when there is a very small number of women in an area, they do not receive much attention; however, when the presence of women is

"disproportionate" (1-27% and 45% +) and "proportionate" (18%-27% and 28%-44%). In other words, disproportionate represents a situation where there are very few women, or else more women than men. Proportionate represents a situation where women are highly visible in the work area, though not a numerical majority.



much more apparent, the frequency and severity of harassment increases. We would speculate that this is due both to increased visibility of women and to an increase in male co-workers' feelings of threat.

The characteristic which is most strongly related to frequency of harassment is age (.338); a woman's "work age" (seniority), however, is not associated with harassment. It may be that chronological age is a more salient factor in harassment than seniority because the former is generally more visible than the latter. Our data on marital status lend themselves to an interpretation found in other research: unmarried women are targeted for harassment more so than married women are (.169). Though they are likely to be the



victims of repeated harassment, unmarried women are not harassed more severely than their married peers. Lastly, the status of a woman's job is significantly related to the frequency (.188), though not to the severity of harassment: women whose jobs rank low within the plant receive more harassment than others.

How do these autoworkers respond to sexual harassment? A categorization of eighty-seven responses reveals that ignoring the harassment or responding mildly to it (e.g. saying "I've heard all that before" or "I'm not your type") were the two most frequently used methods of dealing with harassment. In some instances, women laughed at the harasser or tried to make light of the situation (10.3%). Some women reported that they tried to delay a harasser's request (e.g.



"Maybe some other time" or "I'm busy tonight") hoping that he would "take the hint." Over one-quarter of the women, however, used a more assertive method by either verbally (14.9%), or physically (6.9%) attacking the harasser, or by taking the matter to someone in a position of authority (6.9%).

Do some types of women respond more assertively than others? The answer with regard to our six status characteristics is no: none of the beta coefficients is statistically significant. In other words, those women who are apt to be the targets of harassment, did not respond less assertively to harassment than women who were not victimized. Thus, our hypothesis concerning the handling of harassment receives no support. We also found that when several attitudinal



variables (self-esteem, personal control, feminist orientation) were added to the regression equations in separate analyses, they did not relate significantly to harassment response. ⁵ Similarly, there were no significant relationship between characteristics of the harassers (e.g. age, race, coworker/supervisor status) or frequency of harassment with harassment response. ⁶ Severity of

⁵ None of the beta coefficients for the six independent variables were larger than .100. Entering severity of harassment and frequency of harassment separately in the regression analyses did not change the outcome. Because of this outcome, a separate table for harassment response was not included in the paper.

⁶ A word of caution with regard to these relationships is in order. The interviewers were asked to probe the respondents for specific details about the characteristics of the harassers. This was not carried out systemically (which resulted in missing data), and some of the information which was obtained was obscure (e.g. we couldn't tell if the harasser was younger or older than the victim).



harassment was significantly related ($\beta = .403$; $p = .05$) to response: that is, women who were severely harassed tended to respond in a more assertive manner. The types of responses that women make to harassment cannot be predicted on the basis on the variables we have included in our study. The absence of variable relationship in this regard suggests two different interpretations: the responses of women to harassment are both limited and episodic; or, our conceptualization and measurement of harassment response does not respond to the complex nature of harassment experiences. These interpretations will be further explored at a later point.

Consequences of Harassment

Our analysis of the consequences of

sexual harassment has as its goal to examine the independent effect that the frequency of harassment has on a number of possible dependent variables, while at the same time holding constant the social background and work variables examined earlier (race, age, marital status, seniority, work area sex composition, and job status). We have not tried to develop more elaborate causal models of each one of the consequences examined, but instead have chosen to examine the independent effects of differential experience with sexual harassment. To do this we used standardized regression techniques. The resulting beta coefficients for the independent effects of sexual harassment are found in Table 4 (attached).

We find that frequency of sexual

harassment has statistically significant⁷ and independent effects on eight of the thirty-one consequences examined. Across the different areas of work life we find the following rank order in terms of the proportion of significant relationships: first, relations with co-workers or supervisors (3 of 5), followed by intrinsic job satisfaction (2 of 4), and job mobility (1 of 5). In contrast, the following areas of work life are unaffected by the frequency of harassment: global and extrinsic job satisfaction, control over work, work competence and

⁷ We chose the .05 level of significance rather than the .10 used earlier as a cut-off point for significance. Our justification for this procedure is that the analysis of the consequences of harassment is fraught with more statistical difficulties than is our analysis of the determinants of harassment, and therefore merits a more conservative approach to estimation of effects.

work role.

The two strongest effects of harassment are found for the two items that deal with feelings toward co-workers or supervisors, with betas of .309 and .277 respectively. A third co-worker item dealing with friendships is also significantly related to harassment, while the two behavioral co-worker items are unrelated to harassment. Thus, sexual harassment seems to have a decided impact on attitudes toward co-workers (and supervisors) but no effects on behavior toward co-workers.

The only two job satisfaction items that are significantly related to harassment measure intrinsic satisfaction: opportunities to develop "my own special abilities" and to "do the things I do best." Global job satisfaction and

extrinsic satisfaction are unaffected by harassment.

Only one of the five mobility items is significantly related to sexual harassment on different areas of work life is also given support in our analysis since the effects on relations with co-workers or supervisors are stronger than those on extrinsic rewards, job mobility, control of work, work competency, or intrinsic satisfaction. Of these latter variables only one, intrinsic job satisfaction, is significantly effected by sexual harassment, but less so than are the feelings toward co-workers or supervisors variables.

With regard to consequences for life outside of work, perception of sexual harassment has independent effects upon self-esteem and life-satisfaction, but is

unrelated to family/home satisfaction, political efficacy or personal control for the women in our sample. Sexual harassment thus seems to have more impact on self identity than on personal control (or political efficacy) as we had expected. Contrary to our expectations the findings across satisfaction items indicate that life satisfaction is affected by harassment perceptions, while family/home satisfaction and global job satisfaction are unaffected. It needs to be pointed out that our measurement of many of the satisfaction variables was relatively unrefined compared to that of several of the work variables, since for the former we relied heavily upon single item indicators. Hence our findings with regard to these satisfaction items need to be treated with proper caution.



Discussion

Sexual harassment may be viewed as the verbal and/or physical abuse of women which serves to reaffirm the rights of access and license that men have traditionally held in our society. Though sexual harassment is a potential problem for all women, this paper has argued that it is an especially acute problem for women who have visible status characteristics (e.g. race, numerical representation) which can be used to further reinforce gender stratification. We argued that when status differences between men and women are blurred -- for example, in auto work where men and women tend to have similar jobs and earn similar wages -- other means of creating differences between the sexes becomes



salient.

Our first hypothesis, which predicted that women with less status would more likely be the targets of frequent and severe harassment, received partial support. Two factors, race and work area sex composition, are particularly important because they are significantly related to both the frequency and severity of harassment. We have found empirical support for MacKinnon's (1979) argument that women who are low caste (black) and not simply low status (e.g. young and unmarried) are especially likely to be victims of harassment.

The sex composition of the work area is related to both frequent and severe harassment, though not in the manner we predicted. We predicted that low representation in an area would lead to



harassment. This is not the case. Women who proportional representation is less than the plant average (roughly 10%) are not harassed to the same extent as women in more numerically-proportionate areas. Previous research has argued that an "invasion" of women creates a threatening situation which provokes incidents of harassment (Kanter, 1977; Benson and Thomson, 1980). The definition of invasion" is, of course, likely to be based on relative comparisons of time periods and spatial boundaries: women may be seen as intruders when they first break into an occupation even though they represent a tiny proportion of workers. In the plant we studied, however, a very small proportion of women (e.g. less than 10%) in an area may give the women in the area low status but they apparently are

not perceived as a threat. It is only when they far exceed the plant average and near proportionate equality in their work areas that they become a threatening minority.

Age and marital status are highly visible status characteristics that are related to repeated harassment. Though it is not as easily determinable as race or age, marital status is ascertainable by virtue of physical symbols (e.g. a wedding band) and social exchanges of information among co-workers. According to many of our respondents, marital status is a frequent item of conversation in the plant and tends to spread rapidly through the "grapevine>" As one respondent aptly stated: "They never came around until it got around I was divorced." Though age and marital status are apparently used to

create status distinctions between men and women, these differences seem to have neither the emotional impact that racial differences do, nor the connotations of threat that the presence of a sizable minority of women in a work area does. Although marital status and, in particular, age are better predictors of harassment frequency, they do not evoke the types of aggressive overtures that race and work area sex composition do.

Though its impact on severity of harassment is much less than that of sex composition of the work area, job status does have a significant impact on the frequency of harassment. Persons who occupy the lower-ranked positions in an organization are oftentimes given less respect and freedom as well as treated in a less cordial manner (Kanter, 1977):



according to our data, a consequence of occupying a low-status position in the plant is repeated sexual harassment. A result from our analysis which has some important ramifications is the finding that seniority is not related to the frequency or the severity of harassment. A woman does not escape harassment by gaining seniority because it seems that this increased status does not have much visibility in male-female interactions in the plant.

We cannot clearly determine which characteristics are relevant for understanding why women handle harassment the way they do. Severity of harassment is significantly related to the degree of aggression used in the handling of harassment, which suggests that the directness of women's responses to



harassment is predicated to some degree upon the offensiveness of a man's behavior in a given situation. What we cannot ascertain from the data are the characteristics of women who respond either directly or indirectly to harassment. The lack of relationship for different variables to harassment response suggests two interpretations: no relationships are found because different types of women respond in similar ways to specific types of harassment; and, our method of determining harassment response -- asking women how they "normally handle" specific harassment incidents -- does not reveal the complex nature of sexual harassment.

The absence of relationships of status and attitudinal characteristics with harassment response, in conjunction



with the presence of a severity of harassment-harassment response relationship, implies that sexual harassment is oftentimes handled on a situational or experience-by-experience basis. That is, women use behaviors of the harassers to key their own responses-- and these responses are apparently independent of work status (e.g. seniority, job type) and attitudes (e.g. self esteem, feminism). There is some theoretical justification for the contention that women as a group tend to respond somewhat uniformly to specific types of harassment. One possible explanation is that women's concerns in many harassment episodes may be focused on managing the work situation in a way that terminates the offensive behavior as quickly as possible without raising the



threat of an escalating confrontation. In other words, women may oftentimes be more concerned with the violation of work role and situational definitions than with the violation of distributive justice rules (Emerson and Messinger, 1977). A second possible explanation for response uniformity is that women have not learned how to use personal resources (e.g. high job status, positive self conceptions) in handling harassment. This interpretation suggests that women have a limited repertoire of responses, or perhaps, are fearful of exploring alternative methods because of the uncertainty that is involved. These explanations seem to indicate that women could benefit considerable from group support systems in the workplace which would function to increase women's awareness of harassment

as a social (as opposed to an individual problem and enable women to develop strategies (e.g. by role playing) for handling different types of offensive behavior.

The absence of relationships which we noted for harassment response raises the question of how women learn to respond to harassment. Though we have an understanding of how women "normally handle" specific types of harassment, we have no basis for determining why these methods are normal, or more specifically, how these become "normal". It seems that both passive and assertive responses may be perceived as effective in certain situations because they curtail offensive behavior-passivity (non-reinforcement of male behavior) and direct confrontation both have their advantages and



disadvantages. How women perceive the effectiveness of a response in a given situation or why women opt for one method rather than another are questions which cannot be answered by our research. In order to develop a thorough understanding of harassment response, it seems that we must know something about women's perceptions of response "tradeoffs" in the workplace. For example, a woman may choose to ignore harassment, and thereby increase the risk of further harassment, in order to decrease the risk of a confrontation which might result from the use of more direct methods. We feel that it would be useful to probe women about their response tactics with an eye toward understand the social and experiential basis of these responses. It seems likely that women may arrive at the same



harassment responses from different social or experiential routes. For example, some women might choose to ignore most harassment because they fear the possible consequences of more direct responses; others may use this tactic because, as a result of trial-and-error, they have found it to be generally successful. Knowledge of such "routes" may prove more fruitful in predicting harassment variations than an understanding of status or attitudinal characteristics of the women.

There is some support from our analysis for the view that the effects of harassment extend beyond the workplace: many women who are harassed tend to have lower self esteem and to experience less life satisfaction than others. These results receive support from several empirical studies which find that women

frequently experience emotional and psychological difficulties as a result of harassment experiences. What can add to this body of research is the fact that the effects of harassment on social psychological states persist even when other factors (e.g. age, race, marital status) are controlled for. While a number of women in our study apparently experienced diminished self worth or life satisfaction as a result of harassment, their sense of control does not seem to have been affected by such incidents.⁸

⁸ The correlations between self esteem, life satisfaction, and the personal control items are as follows:

	Self Esteem	Life Satisfaction
--	-------------	-------------------

Self Esteem		306***
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Life Satisfac-		
tion	306***	



These results lend support to our earlier hypothesis that sexual harassment raises more doubts about self worth than about personal control; and at the same time, they raise questions about the differential sources of these self-attitudes in the lives of these women. T

Personal Control Influence what happens	.122	.144*
Own doing	.069	.001
Plans work	.011	.136

*p. ____

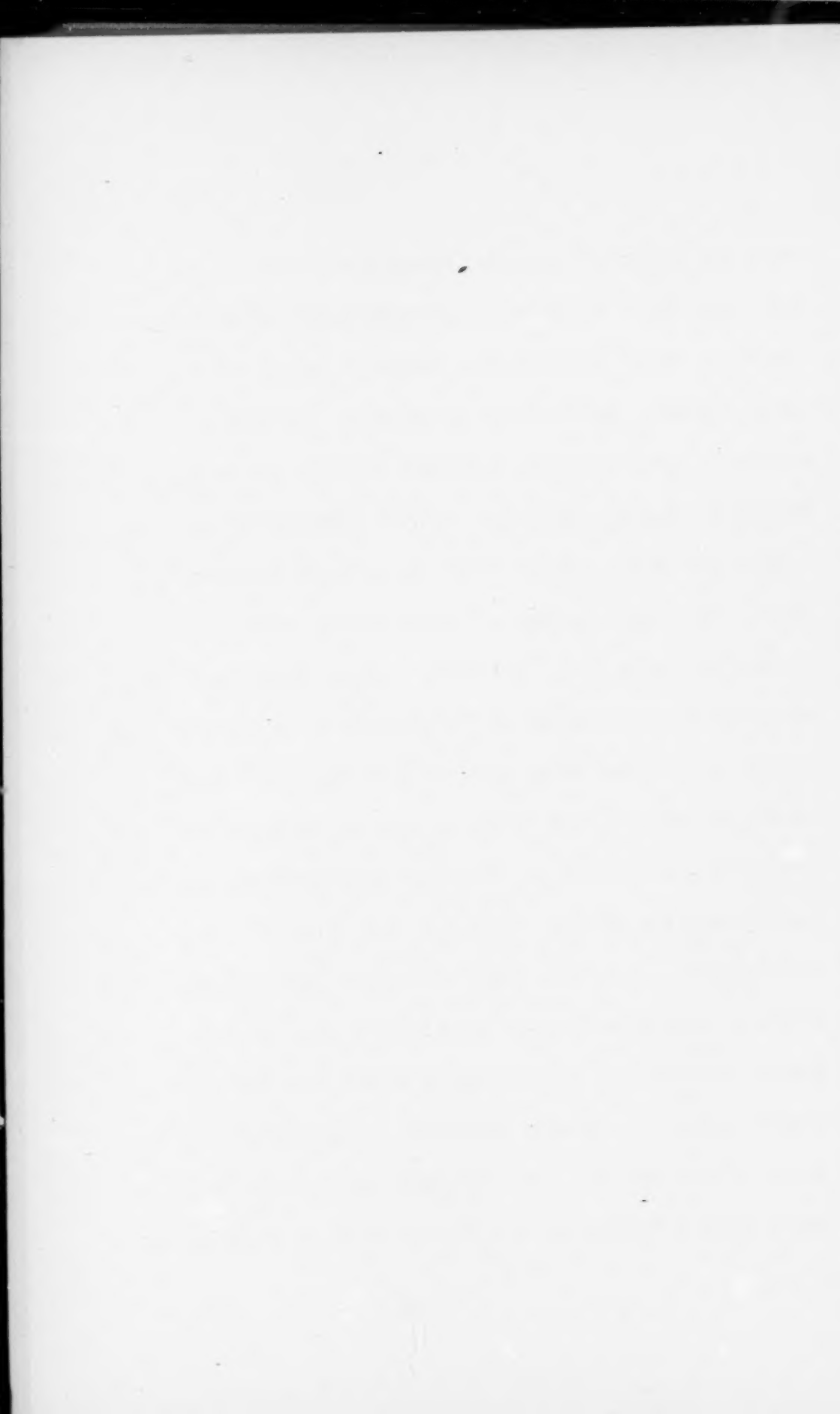
**p. ____

***p. ____

Since these are all fairly "standard" items which appear frequently in the research literature, we are confident that they have a reasonable face validity. However, since these are single items, and not scales, we think that a certain degree of caution must be exercised when interpreting these results.



here is support in the research literature for the fact that self esteem and personal control are sometimes weakly related to each other, and have somewhat different social and experiential causes (e.g. Hulbary, 1975; Mirels, 1970; Sennett and Cobb, 1972). Since we have not focused upon the complex social processes involved (i.e. we have not created causal models), we cannot determine which factors in these women's lives are important for giving them a sense of worth or a sense of personal control. Sexual harassment is interesting with regard to these two variables: it does not seem to adversely affect most women's behavior at work, their perceived competence with regard to their jobs, or their ability in general to make plans or to get things done; at the same time, there is evidence that a number



of harassed women in our sample go about their lives feeling relatively unhappy with themselves and with the quality of their lives.⁹ A group support system for women in the workplace might be beneficial in this regard: these supports might enable harassed women to "depersonalize" harassment -- that is, to perceive it as a social, as opposed to individual, problem -- and thereby help them maintain a positive self image.

⁹ These results can be dramatized by comparing all the harassed women with the remaining women in our sample with regard to self esteem and global life satisfaction. Forty-four percent of the harassed women versus 21% of the non-harassed report low life satisfaction; 75% of the harassed versus 46% of the non-harassed score low on the self esteem item.

TABLE 1

Types of Harassment Incidents:
Frequencies

<u>Harassment Type</u>	<u>%</u>
Sexual Propositioning	28.1
Abusive Language	23.8
Physical Attacks	14.4
Verbal Innuendo	9.4
Sexual Bribery	6.3
Social Derogation	5.6
Body Language	5.0
Others (whistling, stares, unspecified)	<u>7.4</u>
	100.0 (N=160)



Table 2

The Frequency and Severity of Sexual Harassment:
Mean Rates and Beta Coefficients

	<u>Means</u> (N)	<u>FREQUENCY</u>		<u>SEVERITY</u>	
		<u>Beta</u>	<u>S.E.</u>	<u>Beta</u>	<u>S.E.</u> (N=55)
<u>Race</u>					
Whites	1.02 (94)	.141	.084*	.354	.135***
Blacks	1.87 (40)				
<u>Marital Status</u>					
Married	0.72 (54)				
Divorced	1.42 (48)	.469	.085**	-.025	.135
Never Married	1.72 (34)				
<u>Age</u>					
25 or under	1.82 (49)				
26-35	1.00 (46)	.338	.089***	.128	.147



Table 2 (continued)

	<u>Means</u> (N)	<u>FREQUENCY</u> <u>Beta</u> <u>S.E.</u>	<u>SEVERITY</u> <u>Beta</u> <u>S.E. (N=55)</u>
<u>Seniority</u>			
Less than 2 yrs.	1.22 (63)		
2-4	1.52 (33)	.115 .091	-.037 .154
5+	0.93 (37)		
<u>Work Area</u>			
<u>Sex Composition:</u>			
<u>Percent Female</u>			
1-17	1.07 (38)		
18-27	1.34 (29)	.134 .082*	.313 .130**
28-44	1.55 (34)		
45+	0.87 (34)		
<u>Job Status</u>			
High	1.46 (59)	.188 .804**	-.094 .141
Low	0.95 (73)		
R ²		.201	.251



TABLE 3
Responses to Harassment:
Frequencies

<u>Response Type</u>	<u>% of Responses</u>
Ignores Harassment	23.0
Responds Mildly	21.8
Verbally Attacks	14.9
Uses Humor	10.3
Delays	10.3
Physically Attacks	6.9
Complains through channels	6.9
Others	<u>5.9</u>
	100.0 (N = 87)



TABLE 4

Consequences of Sexual Harassment; Independent Effects
of the Frequency of Sexual₁ Harassment,
with Background Variables Constant.

<u>CONSEQUENCES</u>	<u>IMPACT OF FREQUENCY OF SEXUAL HARASSMENT</u>		
	<u>Beta</u>	<u>s.e.</u> ²	<u>R²</u>
Global Job Satisfaction			
degree of satisfaction	-.106	.096	.12
recommend to friend	-.116	.100	.06
Intrinsic Job Satisfaction:			
Interesting work	-.168	.094	.10
develop abilities	-.197	.098*	.12
do best	-.200	.098*	.12
see results	-.083	.101	.03
Extrinsic Job Satisfaction			
pay	-.045	.099	.07



Table 4 (continued)

<u>Consequences</u>		<u>Impact of Frequency of Sexual Harassment</u>	
	<u>Beta</u>	<u>s.e.²</u>	<u>R²</u>
<u>Relations with Coworkers:</u>			
feelings toward	-.309	.094**	.16
friends with	-.211	.097*	.11
talk with while working	-.158	.095	.14
talk with on breaks	-.115	.100	.05
<u>Relations with Supervisors</u>			
sentiment towards	-.277	.097**	.11
<u>Job Mobility:</u>			
Chances for promotion	-.154	.099	.08
fair handling on promotions	-.200	.100*	.09
becoming supervisor	-.114	.101	.09
becoming skilled trades	-.025	.105	.03
like different job	.020	.094	.16
<u>Control Over Work Situation:</u>			
influence what happens	-.054	.102	.04



Table 4 (continued)

<u>Consequences</u>	<u>Impact of Frequency of Sexual Harassment</u>		
	<u>Beta</u>	<u>s.e.</u> ²	<u>R</u> ²
<u>Work competence:</u> <u>time to get job done</u> <u>pride over physical</u> <u>handling</u>	-.172	.098	.11
	-.134	.100	.10
<u>Work Role:</u> <u>work necessary evil</u> <u>centrality of work</u>	.093	.102	.05
	-.160	.101	.05
<u>Life Satisfaction:</u> <u>how satisfied</u>	-.278	.097**	.10
<u>Home/Family Life</u> <u>Satisfaction:</u> <u>how satisfied</u>	-.180	.096	.12
<u>Self Esteem:</u> <u>Perceived Uselessness</u>	-.267	.093**	.18



Table 4 (continued)

<u>Consequences</u>	<u>Impact of Frequency of Sexual Harassment</u>		
	<u>Beta</u>	<u>s.e.</u> ²	<u>R²</u>
Personal control:			
<u>Influence what happens</u>	-.033	.100	.05
what happens own doing	-.007	.099	.07
make plans work	-.137	.101	.02
Political Efficacy:			
<u>say about government</u>	-.008	.099	.06
politics too complicated	.012	.099	.07

1 The following variables were controlled in our standardized regressions: race, marital status, age, seniority, work area sex composition, and job status.

2 *p. _____ ** p. _____

3 The sample size varied for each regression as a result of some missing data. The sample sizes ranged from N = 130-128.



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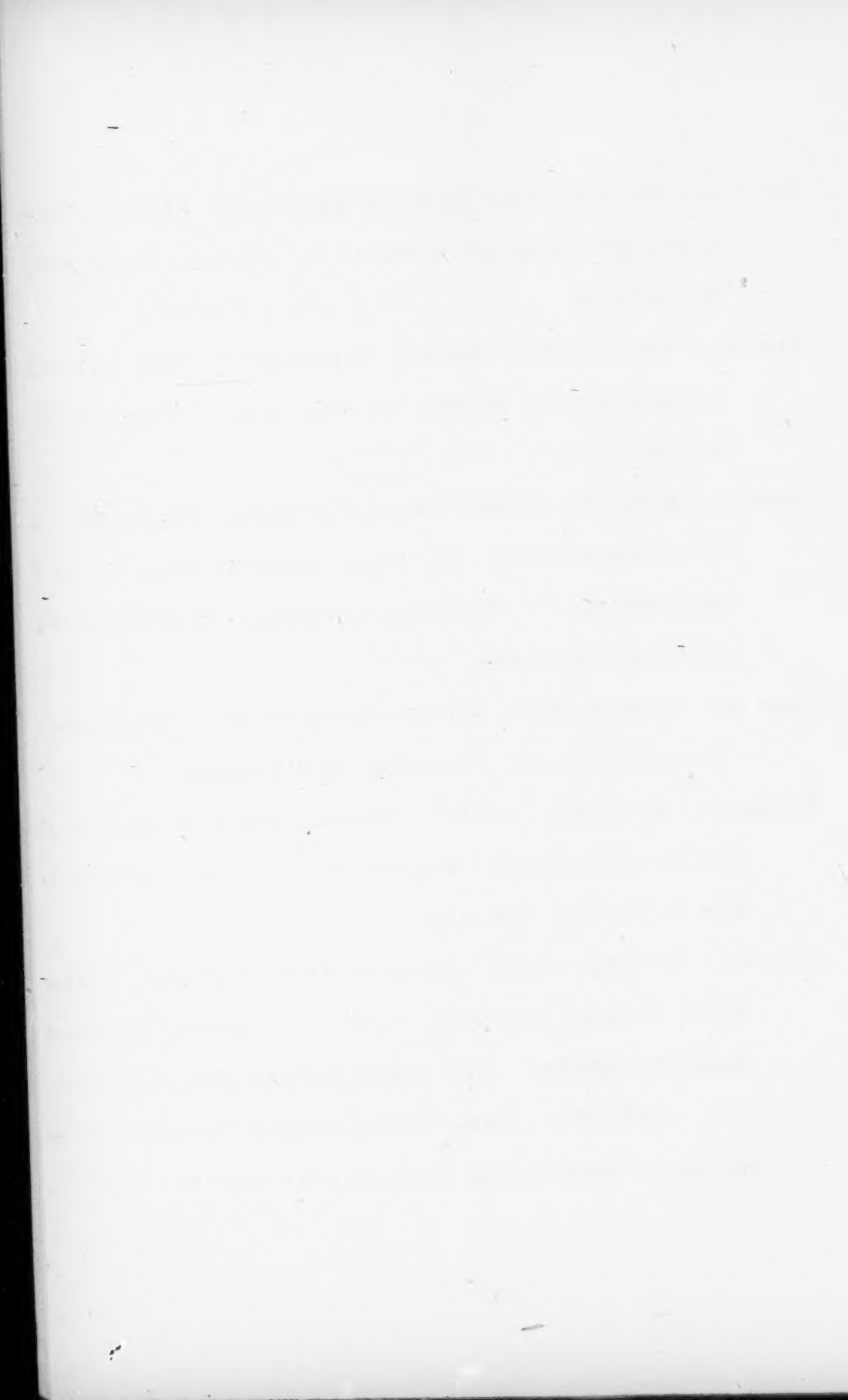
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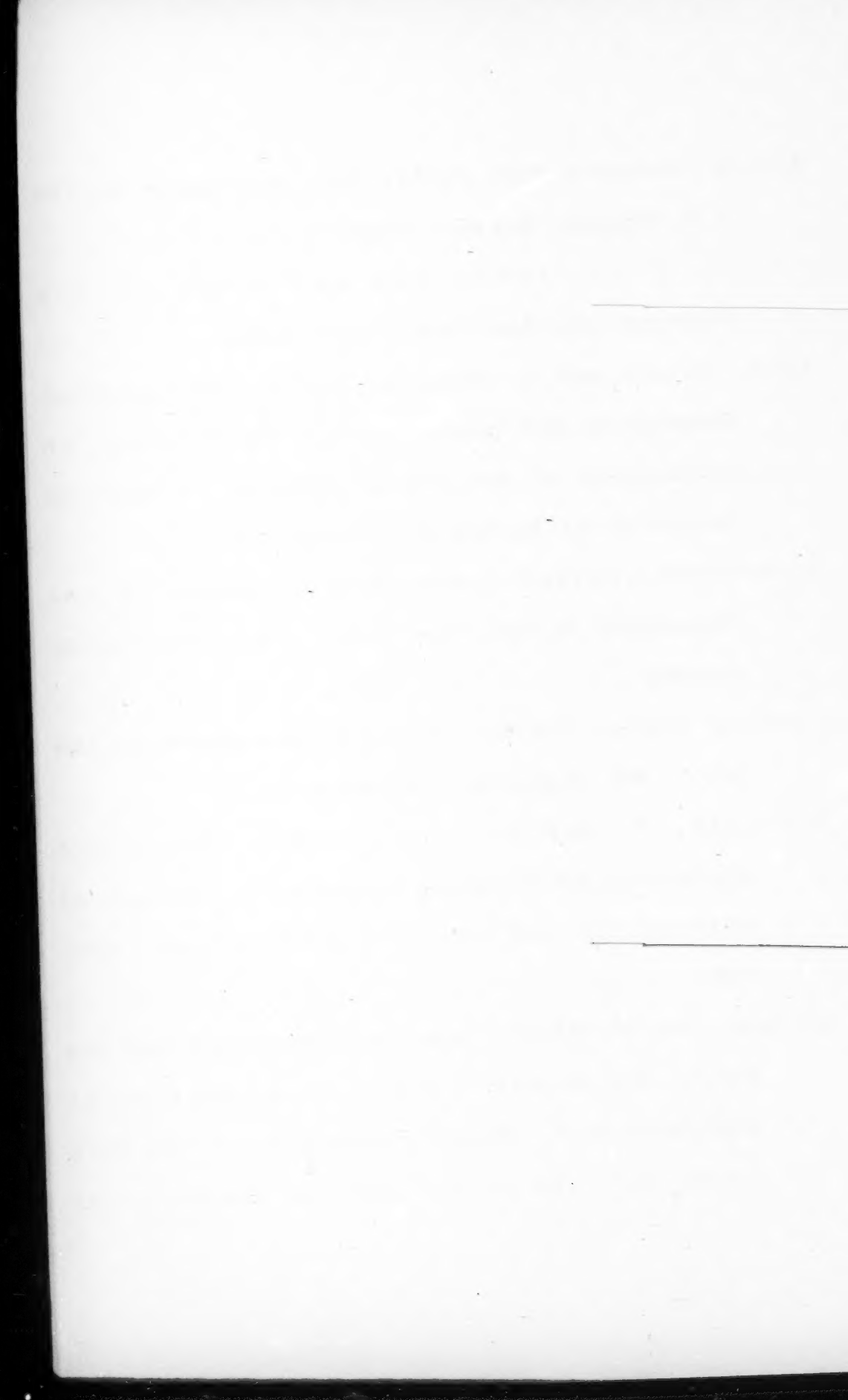
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